

1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF NEW YORK

3 -----x
4 SONNY B. SOUTHERLAND, SR., ET AL,
5 PLAINTIFFS

6 versus

99 CV 3329 (BMC)

7 TIMOTHY WOO,

8 DEFENDANT.

U.S. Courthouse
Brooklyn, New York

9 -----x
10 June 10, 2013

11 TRANSCRIPT OF CIVIL CAUSE FOR JURY TRIAL

12 Before THE HONORABLE BRIAN COGAN,

13 UNITED STATES DISTRICT JUDGE

14 APPEARANCES

15
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24 BY: BRIAN KING, ESQ.
25

APPEARANCES

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Proceedings recorded by mechanical stenography. Transcript
produced by computer-aided transcription.

LISA SCHMID, CCR, RMR

1 (In open court, outside the presence of the jury.)

2 THE CLERK: All rise.

3 THE COURT: Good morning.

4 MR. O'NEILL: Good morning, Your Honor.

5 THE COURT: Be seated, please.

6 All right. Mr. O'Neill, you had something?

7 MR. O'NEILL: Yes, Your Honor. I just want to make
8 sure that my record is complete on the jury charges. We had a
9 discussion about burden of proof on Friday. You made some
10 changes, and obviously not the ones that we asked for. I want
11 to make sure that our exception is noted and our position is
12 --

13 THE COURT: Yes. Let me just say certainly, all the
14 letters from the parties over the weekend, their positions
15 have been considered and to the extent not incorporated in the
16 instructions, they have been overruled.

17 MR. O'NEILL: And would the same be true of our
18 original charges that we submitted, to the extent something's
19 not in there?

20 THE COURT: Yes. Yes.

21 MR. O'NEILL: Then I think our position is preserved
22 and --

23 THE COURT: As far as I'm concerned, it is. Okay?
24 I mean, I will tell you, you did convince me on the mens rea
25 point, but there's no stipulation here of a deliberate action

PROCEEDINGS

1 by the defendant and therefore, I think it's appropriate to
2 put that to the jury. So I've kind of met you halfway, but I
3 understand that's not enough for you.

4 MR. O'NEILL: Thank you, Your Honor.

5 THE COURT: Yes, Mr. King?

6 MR. KING: Yes, Your Honor. I just wanted to make
7 sure my objections are preserved, even though I didn't put any
8 letters up. I'll just put it on the record again now.

9 The jury charge -- the jury instructions are
10 incomplete in that they fail to instruct the jury as to the
11 procedure of due process claim that Mr. Woo did not provide --
12 procedure of due process after the removal, which would have
13 required a hearing, a timely and adequate hearing to determine
14 whether the reasons for the removal were justified.

15 I would also object to the charge to the extent that
16 the damages refers to an Order of the Court and limits the
17 damages to a date when the Court ordered the children would
18 not be returned, and it's because there is no order in this
19 case that ever confirmed the reasons for removal, and so
20 therefore, that would not constitute a limit on damages under
21 any case law in this Circuit or any other Circuit.

22 THE COURT: All right. Thank you, Mr. King.

23 MR. KING: Thank you, Your Honor.

24 THE COURT: All right.

25 Yes, Mr. O'Neill?

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1 MR. O'NEILL: We know the defendant is going first.
2 Am I correct in assuming we're going to do the reverse of
3 closing?

4 THE COURT: I assumed the plaintiffs has worked out
5 between themselves as to who is going to close first.

6 MR. O'NEILL: We have not.

7 THE COURT: Well, is there a dispute about it? Talk
8 to Mr. King.

9 MR. KING: Mr. O'Neill is going first.

10 THE COURT: That's okay with you?

11 MR. O'NEILL: I'd like to have the reverse of
12 openings, which is -- so we'd have the defendant, Mr. King,
13 then myself.

14 THE COURT: You want to go last?

15 MR. O'NEILL: Yes.

16 THE COURT: Mr. King, do you have a problem with
17 that?

18 MR. KING: I'd prefer to go last, Your Honor.

19 THE COURT: All right. We're going to reverse the
20 order of openings, so that Mr. O'Neill will go last.

21 MR. O'NEILL: Thank you, Your Honor.

22 THE COURT: All right. Let's have the jury, please.

23 (Pause in proceedings.)

24 THE COURT: While we're waiting for the jury, I will
25 say I really appreciated the briefing over the weekend. I

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1 thought it was -- the issues are obviously quite complex in
2 this context -- not many cases like this yet tried -- and I
3 know the parties worked very hard in getting me that
4 correspondence, so I could consider it fully.

5 I may, indeed, write something after the verdict
6 comes in, depending on what verdict comes in, but I do thank
7 the parties for their submissions.

8 MR. O'NEILL: Thank you, Your Honor.

9 MR. BOWE: Thank you.

10 THE CLERK: All rise.

11 (Jury enters.)

12 THE COURT: Be seated, please. Good morning, ladies
13 and gentlemen. I hope you had a good weekend. We're ready to
14 proceed with closing arguments. The defendant will go first.

15 MR. BOWE: Thank you, Your Honor.

16 Good morning, members of the jury.

17 JURORS: Good morning.

18 MR. BOWE: In my opening, I told you that Mr. Woo is
19 being sued by the people he rescued, and they were small kids
20 at the time and maybe that comment seemed a little vague, but
21 now you know. You've met Mr. Southerland. And over the
22 course of this trial, you've learned everything I told, you
23 learned in my opening comments last Monday -- and you learned
24 some additional stuff.

25 You learned about Ciara Manning's accusations of

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1 sexual abuse against her father, Sonny Southerland. And I'll
2 come back to Ms. Manning a little later when I talk about any
3 damages in this case -- although I'll tell you, you're not
4 going to reach damages in this case.

5 But I need to ask in my opening statement about the
6 rescued suing the rescuer. It's now crystal clear to you that
7 not only was Mr. Woo rescuing those six small children that
8 night at the Amboy Street apartment, but he was rescuing
9 Ciara, as well. And wow, did she ever need rescuing. You've
10 met her too.

11 First, I want to tell about this theory that the
12 plaintiffs have floated and have been hinting at during this
13 trial, that Mr. Woo is a monster who set up Mr. Southerland
14 with some false accusations of sex abuse by Ciara.

15 To buy that crazy theory, you would have to find
16 that Mr. Woo is this brainiac conspirator who managed to
17 convince three family court judges that Mr. Southerland was
18 sexually abusing Ciara and beating the other children, and
19 that he was so good at this con job that he somehow got Ciara
20 to give all sorts of detailed testimony of the supposedly fake
21 sex abuse, and that no one managed to catch on. And what
22 evidence did they put on of Mr. Woo's motivation? I'm sure
23 counsel will argue something. But I will tell you, I submit
24 they put on no evidence at all of any motivation from Mr. Woo
25 to do anything but his job.

BOWE/SUMMATION

1 You know what really happened here. The answer is
2 obvious. He did it. And you saw it yourself in this
3 courtroom. You heard Mr. Southerland's lawyer ask him, "Did
4 you sexually abuse your daughter, Ciara?" And his answer was
5 this -- and this is a quote -- there was no need for me to do
6 anything like that. There was no need for me do anything like
7 that. She was my daughter. I have no problems with dating a
8 female, closed quote. What did that mean? That it would be
9 okay if he was having a tough time on the dating scene? Wow.

10 So what have we here? I'm going to give you a quick
11 overview of the facts that came in during trial for you to
12 consider in your deliberations. You've got a child trying to
13 kill herself, who keeps running away and no help from dad --
14 in fact, a promise of no help from dad because he didn't want
15 her on medication. But you may ask yourself, why did he
16 promise not to get her any mental health care? I'd ask you to
17 keep that se question in mind.

18 We have a father not allowing access to the home,
19 not cooperating with the school or with ACS. We've got names
20 of young children on a petition to Judge Turbow, along with
21 their sibling, Ciara, submitted to the Court, mistaken
22 names -- the other kids, not Ciara's name. That was correct.

23 You've got a Court-ordered home assessment after
24 Judge Turbow issued the order, during which ACS discovered a
25 bunch of dangers, like nine-year-old Venus with an untreated

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1 puncture wound from stepping on a nail, no food in the house,
2 a lamp ready to light a foam bed where four boys sleep on fire
3 if it falls over just the wrong way.

4 When you have three case workers and a supervisor
5 who decide "can't leave the kids there, at least not tonight."
6 then you have Ciara's sexual abuse allegations which come to
7 light, perhaps for the second time. Then you've got a Family
8 Court judge on Friday, June 13th, who says, "I'm not sending
9 those kids back there." Then a year later, you have another
10 Family Court judge who hears extensive testimony from Ciara
11 about sexual abuse, hears extensive testimony about excessive
12 corporal punishment.

13 And then you've got another judge who hasn't been
14 mentioned much, but we're going look at what Judge Knipps had
15 to say, and then a few years later, after Judge Ambrosio, she
16 says the same thing: Those kids are not going back into that
17 home. And here we are.

18 Now, you're going to get a verdict sheet and it's
19 going to have three claims on it. I'm going to show it to
20 you. I get to introduce it to you. This is what it's
21 going -- this is the actual verdict sheet -- has three claims.
22 You're going to have to decide each of these claims. And when
23 you get to each question, you're going to answer no, no, no.
24 Did plaintiff prove the claim? No. Did plaintiffs prove the
25 claims? No. Did plaintiffs prove the claims? No.

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1 Now, I'm going to tell you, there are pages that
2 follow on the verdict sheet that deal with damages, but as I
3 said, I submit to you you're not going to get to those three
4 pages. You're going to finish with that first page, and now
5 I'm going to tell you how you're going to do that.

6 I expect it's going to take me a little while, so
7 I'm going to ask for your patience. I know 45 minutes,
8 perhaps longer, perhaps shorter sounds like a lot of time, but
9 I have a lot to go over and I owe it to the rescuer, Mr. Woo,
10 the guy that all these plaintiffs have been hurling all these
11 accusations at, horrible accusations, a man who was doing what
12 he believed was right, at a job he believed worthwhile, at an
13 agency, ACS, which Ms. Duran told you is in the business of
14 trying to protect children who are being abused and neglected.

15 So the first of the plaintiffs' three claims, that
16 is, that the search or as we refer to it, the assessment of
17 the apartment that night was illegal because the allegation is
18 the Order of Entry that Judge Turbow signed on Friday had been
19 obtained by Mr. Woo by submitting misleading information.

20 Now, you heard from Ms. Duran, a former ACS senior
21 policy witness called by the plaintiffs -- you remember Ms.
22 Duran. They called her apparently because they thought she
23 would give testimony that would somehow help them make their
24 case. Boy, were they wrong. You heard nothing from Ms. Duran
25 that would give you any reason to buy any of the plaintiffs'

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1 arguments in this case.

2 Now, Judge Cogan will explain the law. He'll
3 instruct you that the plaintiff must have proven that Mr. Woo
4 intentionally misled Judge Turbow into issuing the Order of
5 Entry.

6 Now, let's take it a piece at a time. First, you
7 know that Ciara was named on the petition. So was that
8 misleading? No. That one's easy. Second, the petition was
9 correct in listing Ciara's legal address as 10 Amboy Street.

10 Now, I'm just going to put this on the Elmo, so that
11 you can follow along as we go through this. You'll see the
12 petition gets it right when it lists 10 Amboy Street, Ciara
13 Manning. And that's going to keep sliding over.

14 Now, Ms. Duran told you, you will recall, that when
15 a report of suspected abuse or neglect it received by ACS, the
16 assessment of the home is required to be directed to the legal
17 address of the guardian?

18 (Sonny Southerland, Sr. and Elizabeth Southerland
19 enter at 9:45 a. m.)

20 MR. SOUTHERLAND: Good morning.

21 THE COURT: Please continue.

22 MR. BOWE: The legal address of the guardian who has
23 custody of the child.

24 Mr. Woo told you that as a case worker, he was aware
25 that if the legal address of the parent is 10 Amboy Street,

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1 that's where the assessment has to happen.

2 Question, line 12, "Would your answer change if ACS,
3 prior to filing a petition, was told by one or two other
4 people that the child might not actually be in the home?"

5 Answer: "No, it wouldn't."

6 Ms. Duran told you exactly the same thing.

7 In fact, plaintiffs would have you believe that any
8 time an ACS case worker is investigating an allegation of
9 abuse or neglect and a legal guardian says, "She's not here.
10 She has run away," that ACS should just say thank you, turn
11 around and walk away. You know better than that.

12 And as for Ciara's chronic running away and whether
13 she was in the home, think about this. This is interesting.
14 In the letter from Ms. Ewing, which is Plaintiff's Exhibit
15 S-1, to Mr. Southerland, again, asking Mr. Southerland to get
16 Ciara help. She reports something very interesting. You'll
17 see here on the second paragraph. She reminds Mr. Southerland
18 that Mr. Southerland had conveyed to the school that, "Ciara
19 had threatened to run away if you tried to take her for mental
20 health care." She threatened to run away. You see that right
21 there? Well, how is she threatening to run away if she's not
22 in the home? I submit to you, ladies and gentlemen, you
23 cannot believe him when he says that ACS didn't have a
24 reasonable expectation that Ciara would be in that apartment
25 that night.

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1 Now, a brief detour, but an important one on
2 credibility. Judge Cogan is going to explain to you that if
3 you find that Mr. Southerland lied to you about any fact that
4 matters to this his claims, that you will be free to make the
5 choice to entirely disregard everything he said to you from
6 the witness stand. That is, you're entitled to conclude that
7 you cannot believe anything he said.

8 And if you come to such a conclusion, regarding any
9 lie by Mr. Southerland that matters to his claims, I submit to
10 you that you'll be left with no evidence at all to support any
11 of Mr. Southerland's you claims. And I submit to you, ladies
12 and gentlemen of the jury, that you should conclude exactly
13 that, that when he told you in that witness stand that she
14 hadn't lived in that home for years, that that wasn't true.

15 Now, back to the issue of the evidence and whether
16 Ciara lived there. You'll hear Mr. O'Neill, I expect, tell
17 you about how Mr. Woo's handwritten note proves that he knew
18 that Ciara was not living at the Amboy Street apartment in May
19 of 1997.

20 (Exhibit published.) And he'll take you through
21 this handwritten note, perhaps Mr. King will do the same. And
22 he'll point out the notation that says, "1257 Pacific Street,"
23 and he'll argue to you that that proves that the school told
24 Ciara -- I'm sorry, told Mr. Southerland that Ciara was not
25 living at the Amboy Street apartment. And he'll point out a

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1 handwritten note that says, "Father doesn't approve of the
2 place she's staying," not the place that she is residing or
3 living with or with her new guardian.

4 Now, what counsel won't point out for you are some
5 facts on this handwritten note, but I am going to. These
6 facts actually prove that Mr. Woo couldn't have concluded that
7 Ciara would not be found in that Amboy Street home, her legal
8 address on the night of June 9th. You see where it says, "Is
9 possible. Is possible. Possible." (Highlighting words.)
10 "Is possible."

11 What does possible mean? Well, I'd like you to
12 think about those two words when those lawyers get up and
13 argue to you that this document proves that Mr. Woo was told
14 by the school that Ciara wasn't living at Amboy Street, is
15 possible.

16 Now, you see where it says, "1257 Pacific"? What
17 follows 1257 Pacific? A very dark question mark. I don't
18 need to explain to the jury what a question mark means.

19 Then you'll see something else, "333 Clifton Place,"
20 okay? Is it 1257 Pacific? It is 333 Clifton? Maybe the
21 school thought that she was a chronic runaway. Maybe the
22 school was aware of that. Clearly, the school believed that
23 her legal address was 10 Amboy Street.

24 Do those notes indicate to you that Mr. Woo believed
25 that Ciara was no longer living at 10 Amboy Street? Of course

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1 they don't. And perhaps after hearing my presentation on this
2 allegation, plaintiffs won't waste your time on this.

3 Third, you know the petition for the Order of Entry
4 was correct when it sets forth Ciara's suicide attempt when
5 she drank the can of paint. You have a report from the school
6 and that's Defendant's Exhibit 1, which tells you that Ciara
7 drank a can of paint, that her father had failed to get her
8 help. I'm not going to put this on the Elmo. You'll have
9 this with you. You'll be able to look through -- you'll see
10 what the school reported. You've seen that during the course
11 of the trial.

12 You heard how the school explained to Mr. Woo how
13 they were gravely concerned that Ciara would commit suicide.
14 In fact, plaintiff proved that fact very effectively when he
15 introduced into evidence the letter from Joan Ewing, in which
16 Ms. Ewing is practically begging Mr. Southerland to get Ciara
17 help before it's too late.

18 Exhibit S-1, you see where it says -- this woman is
19 concerned she will kill herself. She met with Gwen Jones.
20 Ciara indicated that she -- first line of the fourth
21 paragraph, "Did not know at the time she drank the paint that
22 it was nontoxic, because she had a plan and expressed intent
23 to kill herself. We considered Ciara to be at high risk and
24 need of immediate medical and psychiatric evaluation, possible
25 hospitalization."

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1 This assessment was confirmed -- not just Ms. Ewing,
2 not just Gwen Jones, but this assessment was confirmed by our
3 principal and the clinical supervisors at Citywide Programs.
4 A lot of people are paying attention to this problem that
5 Ciara is having.

6 Now, the fact that Mr. Southerland refused to take
7 Ciara for psychiatric or mental health care is sort of
8 undisputed -- oh, right. He told you that -- when he
9 testified that, oh, he took Ciara to see a family friend who
10 is a nurse. And why did he take her to see a family friend
11 who is a nurse? Was he concerned that she was at risk of
12 suicide? Of course he was.

13 Now -- oh, by the way, did you hear from that family
14 friend last week during trial? Did plaintiffs call this
15 family friend, this unnamed family friend who spoke with
16 Ciara? No, you didn't.

17 Now, they might argue to you today, excuse me, that
18 Mr. Southerland knew what was best for Ciara. They'll argue
19 that Mr. Woo had no reason to second-guess Mr. Southerland,
20 when on May 30th, Mr. Southerland educated Mr. Woo on why
21 Ciara didn't need to see a doctor.

22 But what they cannot argue is that Mr. Southerland
23 was somehow qualified to make decisions about what to do when
24 a 16 year old tells her school that she's going to kill
25 herself and drinks a can of paint that she believes is toxic.

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1 And why can't they make that argument, that Mr. Southerland
2 knows best? Because you didn't hear any testimony about how
3 Mr. Southerland is trained in how to treat teenagers who are
4 suffering from suicidal ideations.

5 As jurors with life experience, you'll think about
6 how often a parent of a 16 year old who threatens suicide
7 makes the fatal mistake of not getting their child treatment.
8 Happens all the time, sadly. Thankfully, that wasn't the
9 result here for Ciara. But to the point, did Mr. Woo mislead
10 the Court about this issue in his June 6th petition? Come on.
11 Of course he didn't. As he told you himself, my client tried
12 in vain to get Mr. Southerland to tend to the concerns of the
13 school and to get Ciara's psychiatric care that she needed.

14 Mr. Woo was asked by me, "Did you advise
15 Mr. Southerland about the need for Ciara to get help?"

16 "Yeah, I tried as much as I could, as much as he
17 would hear me to do so."

18 "But he was firm?"

19 "Oh, yes. He was firm."

20 And that's what Mr. Woo told the Court,
21 Mr. Southerland refused to get Ciara the help she needed, not
22 misleading. Was it misleading for Mr. Woo to tell the Court
23 that Mr. Southerland had not permitted ACS access to the
24 apartment at 10 Amboy Street? Of course it wasn't misleading.
25 Mr. Woo explained to you that he made four attempts to assess

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1 that residence. He tried May 29th. He tried June 2nd, June
2 3rd, June 4th.

3 Now, of course, they'll argue that Mr. Southerland
4 was only there on one occasion and it wasn't enough to try
5 only once. It wasn't enough that Mr. Southerland came down to
6 ACS and nearly affirmed that he was not going to get any
7 mental health care for Ciara.

8 But you don't know who was in that apartment first
9 time Mr. Woo tried and he heard voices behind the door, a few
10 days after that May 30th conversation at ACS, which apparently
11 caused Mr. Southerland to become very unhappy with Mr. Woo.
12 Any big surprise that they didn't answer the door when he got
13 there?

14 And then he explained how twice a lady answered the
15 door and the first time, told him that Mr. Southerland was out
16 at a meeting, then the second time, made him wait for 15
17 minutes. Didn't invite him in. Made him wait. Said
18 Mr. Southerland is busy. But then we know what happened.
19 Mr. Southerland just opened the door and walked out with the
20 kids. So you can infer what was going on when Mr. Woo
21 repeatedly tried to assess that apartment prior to turning to
22 the Court.

23 Now, you heard Mr. Southerland say that he expected
24 Mr. Woo to make an appointment with him. Ask yourselves,
25 again, you jurors bring common sense and live experience with

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1 you. ACS is charged under the law with protecting children to
2 assess a home for signs of abuse or neglect after a report
3 comes in. Does it make any sense that ACS should be
4 scheduling these visits? Of course not.

5 Let's think about that preposterous notion. ACS
6 wants to come in my home, to see if I'm putting my children at
7 home of harm or neglect. And they're going to come assess my
8 home, say next Monday, around 8:30 p.m. Okay. I'll just make
9 sure the kids aren't home. Makes no sense.

10 So I'd like you to think about that if either of the
11 plaintiffs' attorneys get up here and argue to you that
12 Mr. Woo was wrong for not scheduling an appointment for
13 Mr. Southerland. Too late for Mr. Southerland, though. He
14 testified to that. He expected an appointment.

15 Now, the wrong names of the other children on the
16 petition, did that mislead Judge Turbow? No. Of course
17 plaintiffs will argue that it did, and that it caused the
18 entry order to be invalid, which is what they need to prove in
19 order to make their first claim, in order for you to then
20 check yes, but you won't. You're going to check no. Why are
21 those names of the children which are incorrect not misleading
22 in any material way?

23 Well, first of all, did Mr. Woo did that
24 intentionally, maliciously? No. You heard Mr. Woo. That was
25 a mistake. Mr. Woo explained that an ACS lawyer prepares

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1 those documents that are filed with the court. And you heard
2 that Ciara Manning had other siblings, and some if not all of
3 those other children on that petition are related to Ciara
4 Manning.

5 And then I reviewed with Mr. Woo the ages of -- the
6 composition of those six kids. You'll recall that the
7 composition of those two sets of children were pretty similar.
8 The children listed on the petition are Ciara Manning and then
9 three younger boys, ages 13, 11, and 11, and then three
10 younger girls, ages ten, eight and one.

11 And then on June 9th the children found in the home
12 were -- well, not Ciara, because she was missing, but four
13 younger boys, ages nine, eight, seven, six, and two younger
14 girls, ages nine and three -- similar households. Did this
15 mislead Judge Turbow? Of course not.

16 And by the way, if Mr. Woo had it out for
17 Mr. Southerland, as counsel told you in their opening comments
18 last Monday, why would he be so sloppy as to not pay attention
19 the names the ACS lawyer inserted? After all, he noted some
20 of the first names as Mr. Southerland left that apartment and
21 charged out. Why? Because Mr. Woo had good intentions.
22 Mr. Woo was doing his job. He wasn't busy trying to
23 maliciously confuse Judge Turbow in issuing an Order of Entry.

24 Now, remember Ms. Duran? She explained to you that
25 once ACS has probable cause to assess a home, ACS is required

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1 to assess any child found in that residence. So in the end,
2 as long as ACS had a sufficient basis to assess the home where
3 Ciara legally resided -- and they did. You know that -- any
4 children in that residence needed to be assessed. And if
5 there were emergency circumstances -- which we'll get to in a
6 little while -- insufficient time to get a court order, those
7 children would be removed, whether they were listed on a
8 petition for the Order of Entry or not.

9 So you may be wondering if this is as clear as
10 Mr. Bowe is suggesting, why are we hearing so many questions
11 during trial from Mr. O'Neill and Mr. King on this issue? I
12 have no idea, other than desperation to win -- money, really,
13 money.

14 Now, there's no evidence that disputes them -- when
15 Mr. Woo submitted that petition drafted by his lawyers at ACS,
16 that he acted in good faith, that he believed what he was
17 submitted to the judge was accurate. Plaintiffs have
18 presented no proof to the contrary -- and don't take my word
19 for it. Just look at the order. Judge Turbow issued the
20 order.

21 And on the order, you see that Judge Turbow directs
22 that there's probable cause to believe that an abused or
23 neglected child, and then in parens, R-E-N. So apparently,
24 Judge Turbow is not concerned about whether there's one child
25 or there might be more children. We know this is about Ciara

BOWE/SUMMATION

1 in the beginning.

2 And he orders that the police are going to help ACS
3 do two things. First, they're going to determine if Ciara
4 Manning and these other children are present, and they are to
5 proceed thereafter with a child protection investigation.
6 That's Judge Turbow's order, no evidence that Mr. Woo tricked
7 Judge Turbow.

8 Now, one last thing that you're going to hear from
9 counsel, I expect, unless they abandon this, is this argument
10 that ACS and the police arrived at that night after 9:00 p.m.,
11 that the Order of Entry limits them to arrive prior to
12 9:00 p.m. and not after, and because I expect plaintiffs to
13 continue pressing the same argument in a little while, it's
14 worth going over.

15 A classic lawyer trick that you watched when
16 Mr. O'Neill said to Mr. Woo in an effort to confuse him the
17 following, line 14, this is Mr. O'Neill: "You heard your
18 lawyer tell the jury in his opening remarks that you showed up
19 at the Southerland house a little bit after nine o'clock,
20 correct?"

21 "Yes."

22 "Is that true? In the p.m. of that day?"

23 "Yes. It was late."

24 "Well, your lawyer told the jury it was after nine
25 o'clock. I just want to know" --

BOWE/SUMMATION

1 "Objection, your Honor." Because that's not what I
2 said in my opening.

3 Answer: "It had to be about nine o'clock, a little
4 after nine because we were there a few hours."

5 Question: "When you showed up?"

6 Answer: "Excuse me?"

7 Question: "When you showed up?"

8 Answer: "Yes."

9 Question: "It was after nine o'clock?"

10 Judge Cogan intervened. The Court: "If you know,
11 tell us. If you don't remember, just say, I don't remember."

12 Answer: "I don't remember specifically."

13 Classic lawyer trick, confuse the witness. Tell
14 them your lawyer said something the lawyer didn't say and then
15 get them to respond incorrectly. And I ask you to think about
16 that when Mr. O'Neill stands before you to argue that the
17 police with ACS arrived at that apartment after 9:00 p.m. that
18 night.

19 Now here's my opening statement, given to you last
20 Monday, line 21: "Now, about sometime prior to 9 p. m. on
21 June 9th, Mr. Gaskin (sic) and Lisa Clark arrived at the 10
22 Amboy Street apartment with the police officers."

23 MR. O'NEILL: Your Honor, I hate to do this, but I
24 have to object to the attacks of counsel.

25 THE COURT: Well, counsel's credibility is not an

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1 issue, ladies and gentlemen. All that matters is the
2 testimony of the witnesses.

3 You may continue.

4 MR. BOWE: Thank you, Your Honor.

5 Now, Mr. Woo says that they arrived before 9:00 p.m.
6 He told you that when I got up to question him again, and you
7 can ask to have that read back. The police were there with
8 ACS to keep the peace. And you have an exhibit, the notice
9 the police gave Mr. Southerland after the removal.

10 Now, did Mr. Southerland call the police officer as
11 a witness at trial? Police Officer S. Casali gave
12 Mr. Southerland a notice that told Mr. Southerland that he had
13 has right to demand a Section 1028 hearing and then in parens,
14 right to apply to Family Court for return of child. Officer
15 Casali notes, "Notice personally served."

16 Now, did the plaintiffs introduce any police
17 documents like police memo books or anything that might show
18 that the police arrived after 9 p.m. on June 9th? You know
19 that they didn't. Did they offer any testimony from any
20 police officers that they arrived after 9:00 p.m. on June 9th?
21 Nope. End of story on the Fourth Amendment illegal search
22 claim.

23 Now, illegal seizure -- the next two claims that
24 you'll answer no to on the verdict form deal with the last two
25 of the three claims and that is, was the removal of the

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1 children on the night of June 9th allowable, and that is, were
2 there emergency circumstance?

3 You heard Mr. Woo explain that Mr. Balan had
4 assigned two additional case workers, Ms. Gaskin and Ms. Clark
5 to assess the apartment that night, and the fact that those
6 two other case workers were in the apartment is undisputed.

7 My client explained how once in the home, the three
8 case workers found two conditions of great concern --
9 excuse -- mein the living room and kitchen. They found
10 electric extension cords, connected one to the next, running
11 room to room in a dangerous manner, In a dimly-lit apartment,
12 creating danger of injury for the young children.

13 Insufficient food -- you heard Mr. Woo explain what
14 was in the refrigerator in an apartment where seven children
15 lived, six of them under the age of nine or six of them nine
16 and under. And you heard Mr. Woo very clearly recall for you
17 that that refrigerator had no butter, no mayonnaise, no
18 lettuce, no eggs, no milk for cereal or milk for cookies, no
19 hotdogs, no mustard, no bologna, no cheese, nothing. And Mr.
20 Woo told you that those children had nothing to eat since
21 3 p.m.

22 Medical care for Venus' foot: Next you heard
23 Mr. Woo tell you about how he and the other case workers
24 learned that Venus stepped on a nail and her father had not
25 taken her to a daughter. And you heard from Mr. Woo that he

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1 knew that Venus, that evening, once she was at the ACS
2 facility, got a tetanus shot, and you learned that Venus had
3 been limping that night during the home assessment.

4 Now, we have to take another little credibility
5 detour for Venus. Do you remember when my colleague, Andrew,
6 asked Venus whether she had been living in the home on the
7 night of the assessment. And here's what she told my
8 colleague, line 19: "Were you limping as a result of the
9 injury?"

10 Answer: "No."

11 My colleague went on, "Do you recall giving a
12 deposition in this matter?" My colleague then read from her
13 deposition testimony, question: "I just want to make sure I
14 heard you correctly. You believe so?"

15 Okay. So it begins here, the page before, line 11:
16 "Were you asked the following question and did you give the
17 following answer: Question, do you remember" -- and this is
18 back at the deposition which took place a few months ago in
19 2013 -- question: "Do you remember if you were limping?"

20 Answer: "I believe so."

21 "I just want to make sure I heard you correctly.
22 You believe so?"

23 "Yes. I believe so. I recall walking out of the
24 apartment when they took us."

25 Now, ask yourself why would Venus' deposition

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1 testimony a few months ago where she said I believe so twice,
2 "Yeah, I believe I was limping," how did that change to when
3 she took that witness stand and swore to tell the truth, but
4 she gave you an unequivocal, no, she wasn't limping?

5 Well, that's because whether she was limping and had
6 been injured and had not gotten medical treatment that night
7 in that apartment is at the heart of this lawsuit. And that's
8 why Venus changed her story.

9 Again, I submit to you, and as Judge Cogan will
10 explain, if you determine that Venus gave you any untruthful
11 testimony that matters to the plaintiffs in this case, you are
12 entitled to disregard her testimony as if she had never taken
13 the stand. I submit to you that's exactly what you should do.

14 Now, other conditions in the home that were
15 dangerous: Sleeping conditions for the boys. Three case
16 workers learned, saw, that the four boys, ages nine, eight,
17 seven and six shared a space on the floor to sleep on, a thin
18 foam pad -- you heard -- covered with bedding and right next
19 to it a lighted lamp without a shade, ready to be knocked over
20 and possibly burn any of those children or even worse --
21 doesn't take a really creative imagination -- set the foam
22 ablaze while they slept, God forbid.

23 And you heard plaintiffs' lawyers accuse Mr. Woo of
24 failing to put the lamp on a surface. You'll never know from
25 Ms. Gaskin or Ms. Clark about whether Mr. Southerland told him

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1 not to touch the lamp. He didn't call them as witnesses, did
2 he?

3 And you heard Mr. Southerland tell you about how the
4 lamp had been knocked over many times before, and how he set
5 it on the floor next to that bed, and that when it again was
6 knocked over, the shade broke.

7 And this goes to the issue of cooperation, ladies
8 and gentlemen of the jury. Mr. Southerland made very clear in
9 his testimony that the kids had knocked that lamp over many
10 times, and finally, the shade had broken, but he kept that
11 lamp where it was. And what do you learn from that?

12 Well, do you really -- he's not a shy man,
13 Mr. Southerland. You've met him. And he wants you to believe
14 that if he was told that that lamp shouldn't be on the floor,
15 that he would have removed that lamp? No. You learned that
16 Mr. Southerland didn't cooperate that night in the apartment.

17 Now, a dangerous pile of equipment, Mr. Southerland
18 tells you that the room was locked. Of course he tells you
19 the room was locked. You heard from Mr. Woo, kind of described
20 for you what it was a big pile of electrical equipment, that
21 it appeared to be dangerous, and that it certainly could have
22 posed serious injury to that three-year-old toddler but for
23 all of the children. And I would submit to you, even if that
24 door could have been locked, ACS would have had no way to be
25 confident that Mr. Southerland would have kept that door

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1 locked. He told you from the witness stand how he used
2 equipment from that room, playing music.

3 Now, another factor that goes to the danger that
4 existed in the home that night was the failure to get Ciara
5 help. You heard from Ms. Duran that if during an assessment
6 of a home, a subject child of the report of abuse or neglect
7 has not been provided needed medical care up to that point by
8 that guardian, that that is an additional factor to be
9 considered in making a determination about whether the
10 environment is sufficiently dangerous to warrant an emergency
11 removal.

12 And Judge Cogan will explain to you, you will be
13 free to request to hear -- free to request to hear back the
14 exact words used by the witnesses at the trial. And I suggest
15 to you that if you are at all unsure about what Ms. Duran told
16 you, you should ask to hear the follow question and answer
17 read back to you, question by my colleague, Janice: "The case
18 worker has information that one of the children whose official
19 residence is the house that the case worker is assessing" --
20 which we know is 10 Amboy Street that night -- "was perhaps
21 not there, perhaps had run away, but had tried to hurt herself
22 and told the guidance counselor at school that she was going
23 to kill herself, and that the parent has told the case
24 worker -- that the parent has told the case worker that he
25 would not get help for that child, would that be a fact that

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1 would matter in the case worker's determination of the safety
2 of the home of the other children?"

3 The witness: "Absolutely." And after the objection
4 was overruled, Ms. Duran repeated it for you. She wanted you
5 to be clear on her answer: "Absolutely."

6 Now, you heard that Mr. Woo spoke to the guidance
7 counselor on at least three occasions and that during one of
8 those conversations, the guidance counselor told Mr. Woo that
9 Ciara had said, "I'll go kill myself." You see that in his
10 notes. That's in his handwritten notes I showed you a little
11 earlier.

12 In fact, you didn't hear plaintiffs' lawyers allege
13 that Mr. Woo fabricated the handwritten note and that's
14 because they believe it's accurate, that is, it's undisputed
15 that Ciara's school believed and had repeatedly conveyed to
16 Mr. Southerland that they believed she was at risk of suicide.

17 And it cannot be disputed, as Ms. Duran told you --
18 and again, I remind you, you can have that read back, and
19 that's page 320. Ms. Duran was very clear that that fact, the
20 failure to have gotten Ciara any help, was a factor to be
21 considered in determining the dangerousness in that home that
22 night.

23 Now, another important factor in the home that night
24 was plaintiff's -- Mr. Southerland's failure to cooperate with
25 the case workers. And plaintiff would have you believe and

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1 counsel will argue that Mr. Southerland was not given a chance
2 to cooperate with ACS's need to assess his apartment, and not
3 given a chance to deal with remedying any danger that was
4 found; however, the evidence before you, ladies and gentlemen
5 of the jury shows quite the opposite. The evidence
6 establishes, indeed Mr. Southerland's own testimony and
7 demeanor established that he consisted refused to cooperate
8 with ACS.

9 I reviewed for you a little while ago how Mr. Woo
10 explained the multiple attempts to assess the apartment and
11 how he was prevented from doing that by Mr. Southerland. And
12 you have -- I'm not going to put it on the Elmo. You have the
13 case notes, Mr. Woo's case notes. You'll be able to look
14 through them if you think it's necessary. It's all right
15 there, the attempts that he made to assess that home. We know
16 that Mr. Southerland didn't cooperate with those efforts.

17 And if a parent will not cooperate with ACS in the
18 home to correct whatever problems the case workers have
19 identified, then the case worker's hands are tied. In fact,
20 Ms. Duran told you just that on page 316, line 14: "If the
21 parent refuses to cooperate or refuses ameliorative services,
22 would be impact the assessment?"

23 Answer: "Absolutely."

24 Question: "How might it affect the assessment?"

25 Ms. Duran explains, "It prevents -- it ties the

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1 workers' hands from being able to do anything. If there is no
2 acknowledgment of a problem that needs correcting and the
3 worker cannot get to the point where they can get the parent
4 to work with them to alleviate all of those problems, each
5 differently, but at least to work on them, you have left those
6 children at risk."

7 And that's not the only lack of cooperation Mr. Woo,
8 as well as Ms. Gaskin and Ms. Clark were aware of on the night
9 when assessing the apartment. As you heard, all three case
10 workers watched while Mr. Southerland refused to cooperate
11 with the police officers that night, both outside in the hall,
12 and then again in the apartment. And in so doing, he was
13 refusing to cooperate with the Court Order that told ACS to
14 assess that home.

15 Mr. Woo testified that after the police had
16 convinced Mr. Southerland to open his home, Mr. Southerland,
17 again, inside the home, refused to cooperate. Mr. Woo told
18 you that the case workers had decided -- and this is not
19 disputed by any evidence that you've heard -- that Ms. Gaskin
20 and Ms. Clark would take the lead in any communication with
21 Mr. Southerland that night. And you heard from Mr. Woo why,
22 and that was reasonable, because Mr. Southerland wasn't happy
23 with Mr. Woo. We know that.

24 You heard Ms. Duran testify that ACS practice was
25 always to offer appropriate interventions if possible, but that

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1 that the parent would have to cooperate with those possible
2 inventions, remedies.

3 You learned that Ms. Gaskin and Ms. Clark were
4 taking the lead in talking with Mr. Southerland. I submit to
5 you that without any testimony other than Ms. Duran's on the
6 issue of what ACS case workers tell a parent regarding fixing
7 a problem on the spot, that you should conclude -- because you
8 haven't heard any evidence to the contrary to contradict
9 Ms. Duran's testimony -- that Ms. Gaskin -- you all know what
10 was going on in that home that night -- that Ms. Gaskin and
11 Ms. Clark had any necessary appropriate communication with
12 Mr. Southerland, consistent with the ACS practices that Ms.
13 Duran told you about.

14 Now, there's no question that the evidence shows a
15 very consistent pattern of Mr. Southerland refusing to
16 cooperate with pretty much anyone. First it was Ciara's
17 school, bunch of different people at Ciara's school, no
18 cooperation over and over. Then it's ACS, telling Mr. Woo
19 that he was not going to get any mental care for Ciara, then
20 not permitting ACS to assess the home, then not cooperating
21 with the police, not cooperating with the Court Order.

22 And it's more than a little informative that in his
23 testimony last week, Mr. Southerland told you very clearly
24 that he said to Mr. Woo when Mr. Woo had indicated a need to
25 check for window guards, "Don't talk to me. Come on, give it

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1 a break. What's wrong with you? Don't talk to you to me."

2 And what you also learned from Mr. Southerland's
3 testimony is that he didn't accompany Mr. Woo during the
4 remainder of the assessment, after he said to Mr. Woo, "Don't
5 talk to me." Instead, as you will see, beginning on line 23,
6 Mr. Southerland told you, "While Timothy Woo was searching
7 through the house, I asked Ms. Jones to walk through with him,
8 because I didn't trust him." Okay.

9 And he wants you to believe that Ms. Gaskin and
10 Ms. Clark didn't have standard ACS conversations with him.
11 He'd already told Mr. Woo not to talk to him. Didn't go with
12 Mr. Woo. Ms. Jones went with Mr. Woo.

13 And by the way, did you hear from Vendetta Jones
14 last week? Did she come in and testify for you? You heard
15 about her. You heard about how she was there. You heard from
16 Venus about how she helped get the kids ready for school in
17 the morning. Any testimony from Ms. Jones? Nope.

18 And finally, you'll learn something very telling
19 from Mr. Southerland's testimony last week, "When the time
20 comes for the children to be escorted from the apartment after
21 Mr. Balan made the decision to remove them, did
22 Mr. Southerland tell you that he protested?"

23 "No."

24 Here's what he told you, beginning on line one, "I
25 said what? What are you talking the kids for?" Open quote,

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1 because of the conditions in the home, closed quote. "And I
2 said probably said something like, you're crazy or something
3 to that nature, and didn't really get no response from him,
4 and I just decided to get the kids ready."

5 Did he tell you that he asked the case workers in
6 that moment, Please help me in addressing the problems in the
7 home. Help me remedy these issues." No. Are those words the
8 words of a man who wants to cooperate, so that he might avoid
9 having his children go through a removal that night? You know
10 better than that.

11 Now, here's a huge factor I just want to remind you
12 about again to underscore this point which Ms. Duran made
13 clear. "Remember, an additional factor was Mr. Southerland's
14 continued refusal to get Ciara help."

15 "Did he tell that you night in the apartment that he
16 said, look, I made a mistake. I should have gotten mental
17 care for Ciara. Let's do it. I think I know where she is?"

18 "No."

19 And you heard from Mr. Woo that he didn't take the
20 lead in those conversations, and he made it very, very clear
21 in a very critical way why. Beginning on line 11, "It just
22 seemed in order to reduce any tension or that was experienced,
23 Mr. Southerland had already been upset with me from prior
24 conversations and dealings, so they pretty much -- so that
25 nothing would get out of hand or argumentative, they spoke to

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1 him."

2 Now, ask yourselves, three case workers and a half
3 dozen police personnel in that apartment, does Mr. Southerland
4 really expect you to conclude that after telling the NYPD that
5 there was not going to be a full assessment in spite of the
6 Court Order that the police had in their hands, and that
7 Mr. Woo and Ms. Clark and Ms. Gaskin walked out of the
8 apartment without any of them having conversations with
9 Mr. Southerland about what might be able -- what might be able
10 to be done to address any of the dangers, and that the police
11 just stood by and that there were no conversations.
12 Mr. Southerland just said, "Okay." That version of events is
13 simply not believable, and you know it.

14 So conversations with Gaskin and Clark, we're never
15 going to know any of the specifics of the conversations they
16 had with Mr. Southerland. But you heard Ms. Duran's testimony
17 about the conversations that take place and again, you can
18 have her testimony read back.

19 Now, Ms. Duran, as you will recall, was not easily
20 confused. We all observed that. And you heard Ms. Duran say
21 that while each separate dangerous condition might have a
22 remedy available, she was very clear that any such easy fixes
23 would depend on the circumstances and on whether the parent
24 was willing to cooperate.

25 Now, she explained that, again, if you decide you

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1 need to hear her read back on pages 313 through 316 -- 313 to
2 316. She made it crystal clear that the collective total of
3 all of those dangerous conditions could serve as the basis for
4 removal without a Court Order.

5 Finally, I want to remind you of the testimony
6 Mr. Woo gave -- and this may be undisputed. We'll see what
7 Mr. King and Mr. O'Neill decide to argue in a few minutes --
8 but Mr. Woo made, along with Ms. Gaskin, and Ms. Clark,
9 effectuated the removal of those children after Mr. Balan
10 directed him to do it. Mr. Woo was very clear about that. So
11 not only do you have Ms. Gaskin, Ms. Clark and Mr. Woo finding
12 these dangerous conditions, causing concern that the children
13 might be harmed if they were left in the home prior to getting
14 a Court Order, but Mr. Balan agreed and directed the removal.

15 Now, you're going to hear counsel for plaintiffs get
16 up and argue to you that there's a reason we didn't call
17 Mr. Balan. And in their summation, I think they'll probably
18 spend a little bit of time on that and they might read you my
19 opening comment, where I told you you would hear from
20 Mr. Balan.

21 Now, I'll tell you why you didn't hear from
22 Mr. Balan. We decided not to call Mr. Balan, because we found
23 that after plaintiff -- who bears the burden of proving his
24 case -- finished with his case, his case is missing in action,
25 and we decided not to waste your time, the Court's timing or

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1 Mr. Balan's time with another day of testimony.

2 But something more interesting that I want you to
3 think about when Mr. King and Mr. O'Neill get up and complain
4 to you about Mr. Balan not coming in as a witness, is
5 something that they won't tell you, but I'm going to tell you
6 and I'm going to ask you to think about this, if they argue
7 this point: Either of them -- either of them were free to
8 call Mr. Balan as a witness at trial. They decided not to do
9 it.

10 Now, they'll tell you that we had indicated that we
11 were going to call Mr. Balan and that's why they didn't call
12 Mr. Balan. No. What they won't tell you is that this happens
13 all the time in litigation. The defendant doesn't bear the
14 burden to prove plaintiffs' claims. If plaintiff doesn't
15 prove his claims, the defendant doesn't have to call anyone.
16 So just think about all that when they go into this bit about
17 how Mr. Balan wasn't here.

18 Now, 16 years later, Mr. Southerland would have you
19 believe that if only Mr. Woo had found on a table to place the
20 lamp on -- remember that question to Mr. Woo? Why didn't you
21 just put the lamp on a table? He would have you believe that
22 if Mr. Woo had done that, everything in that apartment would
23 have been a birthday party for those kids. It's just not
24 believable. I submit to you, ladies and gentlemen of the
25 jury, based on the evidence you have before you, that ACS

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1 should have concluded that it could have left those kids in
2 that apartment that night and relied on Mr. Southerland's
3 promise -- you didn't even hear about any such promise -- but
4 relied on Mr. Southerland's promise that he would alleviate
5 those dangerous conditions and keep them that way.

6 Now, where would the blame have been if a week
7 later, after leaving those children in that apartment with
8 that lamp placed -- let's say Mr. Woo had put it on a table.
9 We know that Mr. Southerland kept putting it back on the floor
10 because the kids kept knocking it over. What would have
11 happened if a week later, one of those boys had knocked that
12 lamp over and that foam pad had been set on fire? Thankfully,
13 that was not the result here.

14 Now, damages. I submit to you that you won't get to
15 damages. I've told you that already. Certainly, the evidence
16 proves that there were emergency conditions in that apartment
17 on that night, justifying the removal of those children, and
18 Ms. Duran's testimony brought that all together for you -- but
19 as I told you, the verdict form has a few pages on damages,
20 and Judge Cogan is going to give you instructions on damages
21 because he needs to. He has to. And since he's going to do
22 that and since they're on the verdict sheet, I'm going to run
23 through damages with you.

24 Now, were those children really harmed by the
25 removal that night? You'll hear from Mr. O'Neill and

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1 Mr. King. They'll wax on about how those kids were ripped out
2 of the home that they were happy in and safe in. But you know
3 what was going on in the home that night. Even if you decide
4 that somehow, there was a mistake made with respect to
5 removing those children on June 9th -- I submit to you that
6 you won't determine that, but even if you did, I'm about to
7 explain to you how this evidence proves no damages for the
8 plaintiffs at all.

9 And why is that? Well, you've heard that Ciara made
10 allegations of sexual abuse against her father, and that on
11 June 13th, 1997, four days after the kids were removed from
12 that home, the Family Court judge kept the kids out of that
13 home.

14 You know from Ms. Southerland's complaint that on
15 the 13th of June, Mr. Southerland was at court when Judge
16 Turbow, after hearing about the sexual abuse allegations made
17 by Ciara, Judge Turbow -- I'm sorry. Here we are -- Michael
18 Ambrosio, on that Friday -- no. That's not it. Pardon me.

19 This is where Judge Turbow is -- he signed this.
20 Put it in here. He signed a search warrant based on false and
21 untrue information and on June 13th -- this is what
22 Mr. Southerland alleges in his complaint -- "Ordered my six
23 children be remanded to ACS," and then he makes his
24 Constitutional claim against Judge Turbow.

25 ^^So you know from Mr. Southerland's own complaints

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1 and from his testimony in the witness seat when he told you he
2 was there on that Friday.

3 (Continued on the next page.)
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1 MR. BOWE: Where he told you he was there on that
2 Friday and that he had gotten that petition that the judge
3 remanded custody it ACS.

4 Now, you may hear counsel get up and argue that
5 there is no proof, that there is no proof that Judge Turbow
6 did that. Well, why is there no proof?

7 Here is something that you will find what was moved
8 into evidence by Mr. Southerland Exhibit S-4, decision and
9 order by Judge Knipps in July 2002. And you'll notice when
10 you get this exhibit a footnote by Judge Knipps where she
11 explains the trouble she had in locating transcripts of the
12 hearing that had been held in front of Judge Ambrosio. She
13 notes something very odd. The original transcripts could not
14 be found so the court ordered new transcripts. Well, I would
15 submit to you that however those original transcripts went
16 missing perhaps that's how the order that Judge Turbow issued
17 in writing on June 13th went missing. We don't know.

18 In any event, I will remind you that Ciara Manning's
19 allegations of sexual abuse are the substantial cause of any
20 damages it plaintiff.

21 Now, if you were even it consider the time period
22 between the night of June 9th and the court order issued on
23 June 13th that leaves three days and change. If you were it
24 try it assess dangers and, again, I don't think youre going to
25 get past the first page of the verdict sheet, I'm going to

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1 explain to you why there is no evidence of damages for the
2 removal during those days.

3 First, you know that Family Court determined that
4 Mr. Southerland had been sexually abusing Ciara prior it the
5 removal on June 9th and that judge also determined that all of
6 the plaintiffs had been abused as well. And that all the
7 plaintiffs had been victimized for excessive corporal
8 punishment so where is the damage for removing them from the
9 home.

10 Second or, rather, third you should find that with
11 an empty refrigerator Mr. Woo rescued those kids and took them
12 to a place where they would have sufficient food, sufficient
13 meals, sufficient nutrition. A place where they wouldn't go
14 it bed hungry, where their last food was at 3:00 p.m.

15 Next, you should find that there is no damage for
16 those couple of days because they were rescued from the risks
17 of fire and electrocution and injury. But, again, if there is
18 any proximate cause for the seven-year separation as Mr. King
19 characterized in his opening of those children from
20 Mr. Southerland, Mr. Woo is not the proximate cause of that.
21 Ciara's allegations of sexual abuse and Mr. Southerland's
22 conduct are the cause of that separation.

23 Now, you heard Mr. Southerland testify that all
24 Ciara told the Family Court was he did it. Remember that?
25 But, in fact, you know Ciara gave detailed testimony of the

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1 alleged sexual abuse to Judge Ambrosio and that's what caused
2 the damages here.

3 Now, Ciara tells you about the details she gave in
4 Family Court, I don't recall. But you'll remember, because
5 I'll remind you that, that Ciara had no problems remembering a
6 whole lot of other stuff. She remembered details of
7 conversations she had with her counselor. She told you that
8 she never said she was going to kill herself. She told you
9 she remembered how her father came and picked her up after she
10 drank the paint. She remember how people threatened her if
11 she didnt give false testimony against her father that she
12 would go to jail. She remembered a lot, but when it came to
13 what did she tell the Family Court judge about all of the
14 specific allegations of sexual abuse here's what she told you.

15 I don't remember that.

16 I don't remember that.

17 I said, I don't remember.

18 I don't remember giving the testimony.

19 I don't remember that.

20 I don't remember that.

21 Now, again, on credibility, is it plausible for
22 Ciara to have testified under oath that she didnt remember any
23 of this testimony that she gave the Family Court, no, we know
24 that its not. And because you should determine that she was
25 dishonest under oath you should disregard all of her

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1 testimony.

2 Now, Mr. Southerland wants you to blame Mr. Woo for
3 all the years the children were out of his custody and that's
4 what the other plaintiffs want you to do. I submit to you
5 that it was Ciara's testimony of sexual abuse and, as I've
6 said, Mr. Southerland's own conduct that caused the
7 separation.

8 Now, I want you to follow this very closely, and I
9 brought this up in the beginning. This was the question that
10 Mr. Southerland was asked and here's how he answered it:
11 "There was no need for me to do anything like that she was my
12 daughter. I have no problems with dating a female."

13 Think about it. Is that how you would answer a
14 question about whether you sexually abused a child, your own
15 child? "Why would I need to do that?"

16 Now, in this case, everyone was wrong. You heard
17 Plaintiff's testimony. He had you believe the school
18 principal was wrong. He had you believe that the clinical
19 supervisors at citywide services were involved. He had you
20 believe Ms. Ewing was wrong. And when Jones, the school
21 counselor, was wrong. Mr. Woo was wrong. Mr. Woo was when he
22 tried to an appointment to see Mr. Southerland. He was wrong
23 when he spoke to Mr. Southerland. He was wrong in going to
24 look to see if there were window guards. Mr. Woo was always
25 wrong. Mr. Southerland and Ms. Giakas and Mr. Balan was

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1 wrong. Judge Turbow was wrong when he issued the order of
2 entry on June 6th. The police were wrong because they have
3 arrived after 9:00 p.m.

4 Judge Turbow was wrong again the following Friday,
5 on the 13th, when he remanded the custody of the children. A
6 year later, Judge Ambrosio was wrong after he ground after
7 hearing we have and testimony that Mr. Southerland had
8 sexually abused Ciara and had excessively had beaten and had
9 used excessive corporal punishment against the other children.
10 And those aren't the only people who were wrong.

11 The list goes on and on and on. Everyone is wrong.

12 Now, Judge Knipps she was wrong, too. I don't know
13 if she was a defendant in this action. I don't have the
14 entire complaint in front of me, but we do have her opinion
15 and she tells you on Page 1 of that opinion that after hearing
16 the testimony this is what Judge Knipps says after hearing the
17 testimony of 11 witnesses, 11 witnesses, in a trial that
18 spanned five days, the honorable MIChael Ambrosio signed a
19 fact finding order reflecting the Court's determination that
20 the respondent, Mr. Southerland, had sexually abused his then
21 17-year-old done and had engaged in excessive corporal
22 punishment and had accordingly abused and neglected his seven
23 children. Right there. You'll have this exhibit, this was
24 right on the front page. Judge Knipps very clearly sets out
25 what Judge Ambrosio found. She states, a few pages later

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1 that: Judge Ambrosio's oral decision on July 1, 1998, made
2 clear his finding.

3 Now, remember, Mr. Southerland told you he was
4 there. All Ciara said was he did it. But somehow
5 Judge Knipps says Judge Ambrosio's oral decision on July 1st
6 made clear his finding after because was based primarily upon
7 the testimony of the subject child Ciara who testified in
8 court.

9 And she goes on. During the trial of this matter,
10 the subject child testified and was subject to
11 cross-examination by the respondent.

12 After hearing testimony of the child's history,
13 Judge Ambrosio nevertheless found Ciara's testimony completely
14 believable and noted that respondent's own witnesses give
15 additional credibility to her statements.

16 All she said was he did it.

17 Now, lets another forget Ms. Durant. Ms. Durant was
18 wrong along with everybody else. But remember Ms. Durant made
19 clear that the cumulative dangers that were identified in that
20 home would appropriately serve as a basis for an emergency
21 removal.

22 Now, Mr. Southerland is literally banking on you not
23 being clever enough it understand what's going on here. And
24 ask yourselves did you hear Mr. Southerland when the other
25 plaintiffs present any evidence at all other than their

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1 self-serving denials to explain why Judge Ambrosio would make
2 the decision and findings that he made about excessive
3 corporal punishment.

4 Did you hear anything? Any evidence at all to
5 explain to you why judge Ambrosio reached that finding? No.
6 I submit to you he didn't aside from self-serving denials and
7 I submit to you, ladies and gentlemen, that when counsel get
8 up in just a couple minutes I'm nearly through that you ask,
9 you keep this question in mind.

10 If you accept the Court's finding that
11 Mr. Southerland sexually abused Ciara and got to warn her
12 about this question what was the real reason in May and June
13 of 1997 and Mr. Southerland was refusing to take Ciara to a
14 mental health professional. I submit to you that question
15 answers itself.

16 My last thought for you today is something that
17 Mr. Woo believes is very important for you to consider. I
18 have two thoughts more actually. Even though the kids gave
19 some limited testimony about their years in foster care this
20 case is to the about their years in foster care. Its about
21 plaintiffs trying to blame a well intentioned ACS case worker.
22 The conduct of Mr. Southerland and the decisions
23 Mr. Southerland made every step of the way which impacted his
24 children. You heard the Southerland children take the stand
25 and testify about the pain of removal from their father. But

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1 here's something you to the to bear in mind. The pain caused
2 by a removal, whether or not the removal was lawful this one
3 was, is a given. The pain is a given. Because even when ACS
4 does everything right, does everything by the book, which is
5 this case, there's going to be pain when children are
6 separated from their parents whether that removal is good in
7 the long run for those kids or does.

8 Mr. Woo does dispute abused genuinely at risk there
9 will be pain no doubt. But that doesn't mean that ACS is
10 wrong to do so or liable for the pain. And the pain of
11 removal described by the plaintiffs certainly doesn't prove or
12 really even suggest that Mr. Woo, Timothy Woo that he was
13 wrong Torres cueing the Southerland children on June 9th from
14 their abusive and neglectful father, Sonny Southerland.

15 Now, I've been talking to you for a long time and
16 I'm going to have to go sit down now and I'm not going to be
17 able to return to give you any more comments. Those are the
18 rules.

19 And so, now youre going to hear not one, but two
20 submissions from each of plaintiffs' counsel. And I have to
21 try to think, and I clearly spent a lot of time thinking about
22 the arguments that they might get up and make to you in just a
23 couple of minutes. But since I can't return to respond to
24 something I may not have anticipated I'm going to ask you to
25 do something for me.

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1 I'm going to ask you to, if you hear something that
2 I haven't addressed or something that surprises you, something
3 that comes out of left field. Think about how would Mr. Bowe
4 respond to this?

5 So I ask you to do this so that the theories that
6 you hear from counsel wont overcome the evidence. The
7 evidence is clear, Mr. Woo was acting in good faith at all
8 times when those children were properly removed from their
9 home on June 9th.

10 Thank you four your time.

11 THE COURT: Thank you, Mr. Bowe.

12 Ladies and gentlemen well take a ten minutes
13 convenience break. Be back here at, please, at five after
14 11:00.

15 Please do not yet start talking about the case
16 amongst yourselves nor with anyone else, of course. Well see
17 you in just ten minutes to continue the closing arguments.

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BOWE/SUMMATION

1 (Jury exits courtroom at 10:

2 THE COURT: 55 a.m.) Recess, 11:05.

3 (A recess in the proceedings was taken.)

4 (In open court.)

5 COURTROOM DEPUTY: All rise.

6 THE COURT: Lets have the jury, please.

7 COURTROOM DEPUTY: All rise.

8 (Jury enters courtroom at 11: 10 a.m.)

9 THE COURT: All right. Be seated, please.

10 Mr. King, you may proceed.

11 MR. KING: Thank you, your Honor.

12 Good morning, ladies and gentlemen.

13 THE JURY: (Collectively) Good morning.

14 MR. KING: A week ago in opening statements, I told
15 you this was a case about a family that was torn apart when a
16 social worker named Timothy Woo came to the family's home and
17 committed the malicious act of removing the children from the
18 care and custody of their father. These are those children,
19 they're now all adults.

20 As I told you in opening statements, after Mr. Woo
21 we moved those children, they didnt come back for several
22 years. The first child did not come back for at least seven
23 years.

24 Now, in order to determine whether that constitutes
25 a violation of Mr. Southerland and the children's rights, you

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1 have to know more, you have to know the whole story. You have
2 to know what happened before that night, what actions Mr. Woo
3 took and others. You have to know after that night, that what
4 Mr. Woo did after that and others.

5 And so, Ill just start at the beginning.

6 You learned in testimony that this is Sonny
7 Southerland, Sr., you learned that he has fathered ten
8 children. You learned his oldest daughter, who came and
9 testified before you, is Ciara Manning; born in 1980.

10 Mr. Southerland and Ciara Manning both testified that when
11 Ciara was young, being that she was the first, the eldest
12 daughter, that Mr. Southerland's showered her with gifts and
13 attention.

14 You also learned, unfortunately, that Ciara was in
15 the custody of her mother when she was young and that her
16 mother was on drugs and was unreliable as a parent,
17 irresponsible, would leave Ciara in the care of people, random
18 people, and turn up missing for several weeks. That's why
19 Mr. Southerland, at the time that Ciara was two or three years
20 old, he went and petitioned the Family Court for custody.
21 Took him eight long years to get custody of Ciara from the
22 time she was three or so until she was 11 years old he was in
23 the Family Court trying to get custody of her to get her way
24 from her mother who was neglecting her.

25 Now, he finally succeeded. She was 11, perhaps

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1 12 years old when she started to make the transition away from
2 her mother's custody to Mr. Southerland's custody. During the
3 transition period, she did spend some time at her
4 Grandmother's house but eventually, by the time she was 12 or
5 13, she moved in with Mr. Southerland.

6 Now, at the time she moved in with Mr. Southerland,
7 things had changed. He had six more children, only five of
8 them are here. As you heard one of them, Emmanuel, who was
9 also a plaintiff in this case, he has since died.

10 Well take a moment out of respect, think of him, and
11 we get back to what happened.

12 So Ciara moved in with her father and six other
13 children and she immediately started having problems. You
14 heard her testify that she felt she wasn't getting enough
15 attention. She felt that the children were getting attention
16 and she was envious and jealous of them.

17 You heard her testify that she used to torture them
18 and it got to a point after several months that she couldn't
19 take it any more over there; and so, as she testified and
20 Mr. Southerland testified she started running away. The first
21 time she ran away she was 13. And when she ran away that
22 first time, her daddy came and found her that same day and
23 brought her home. And that recreated that feeling of
24 attention that she had so craved. She knew her daddy loved
25 her. When he came to find her and bring her back home and so

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1 she made it a pattern to run away every time she felt she
2 lacked attention.

3 What happened next is quite interesting. By 1997,
4 Ciara had settled at the home of an adult friend by the name
5 of Shakeema Canty. The address was 12457 Pacific in Brooklyn.
6 Mr. Southerland didnt approve of that home, but because over
7 the years Ciara running away, Mr. Southerland had been trying
8 to so hard to keep up with her, he had filed P.I.N.S.
9 warrants; that is, Persons In Need of Supervision. He had
10 filed petitions for those trying to get a court to actually
11 supervise Ciara so that Ciara would have a stable home
12 environment so that she would remain in school so that she
13 wouldnt be out running in the street. Mr. Southerland had
14 tried working with social work agencies include ACS Mr. Woo's
15 employer the advice they gave him was continue to file
16 P.I.N.S. petitions.

17 Now, Ciara was smart. You have to be smart to be
18 able to runaway at 13 and find places to be where your dad
19 can't find you. She had to be resourceful, she had to know a
20 lot of people, and so these P.I.N.S. warrants weren't working.
21 As she testified, she would be summonsed to court on a
22 P.I.N.S. warrant, she'd come to court, see her daddy there,
23 and once she saw him there she'd leave. Why was she waiting?
24 She wanted to remember that feeling: My daddy is coming for
25 me, he loves me. Ciara was striving to get her daddy's

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1 attention, and so, she would appear at the courthouse to make
2 sure he was actually still looking for her. But then she
3 would leave again because she didnt want to go back to an
4 environment where she had to compete for the attention of her
5 dad. Six other kids, some of them were very young but for
6 sure, Mr. Southerland could not provide her the same amount of
7 attention and gifts that he used to.

8 So, in 1997, she's at Shakeema Canty's house and a
9 very traumatic event happened, her older brother died. Had
10 older brother Khaddari died. This sent her into an emotional
11 tailspin. She needed the comfort of her father, she had just
12 lost her brother, and her mother was somewhere in the wind.

13 Well, she strived to get her father's attention in
14 one way. She called her dad up, she said: You know, Dad,
15 Memorial Day weekend is coming up and I want to go out of town
16 and I need an outfit and I want to go visit a guy somewhere
17 out of town. And her daddy says, well, one, I'm not going to
18 give you money to go and meet some guy out of town, youre 16
19 jurors old. And he also told her, hey, I really don't have
20 the money right now.

21 Well, Ciara was hurt by that, she was angry at him.
22 So she went to school the next week and on May 12, 1997, she
23 went into her art class, she opened a can of paint while
24 everybody was watching and she drank from it. Of course, this
25 sent her teacher into shock, this sent the students into

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1 hysteria. Ciara knew what she was doing, she's no dummy.
2 This is a person who had been running away for several years
3 and evading law enforcement, evading the courts evading her
4 father. She knew exactly what she was doing. As she
5 testified, she knew it was water based paint and so what she
6 wanted to have happen is she wanted her daddy to come up to
7 the school.

8 Well, the teacher did exactly as Ciara thought the
9 teacher would do. She have took Ciara down to the counselor
10 and the counselor said: Ciara, why did you drink that paint?
11 And Ciara says: Because I'm mad at my daddy. And, of course,
12 just as Ciara had planned it, her daddy came up to the school
13 and talked with her and said: What's wrong? What's going on?
14 And they had a conversation, and Ciara expressed her
15 grievances, and then, as the letter says, that you have in
16 evidence from the school Ciara was feeling better.

17 Now, this all happened -- the letter is dated
18 May 15th, the paint drinking incident was May 12th. As you
19 see in the letter, also I don't have to show it to you, you'll
20 have it back there, you can look at it. Just please look at
21 it closely, read the whole thing. It says: Thank you,
22 Mr. Southerland, for cooperating. We understand that you
23 tried to get her to go to treatment and that she told you she
24 would leave before she went to treatment, that you wouldnt be
25 able to find her. Okay.

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1 The letter also says that the school understood that
2 Ciara was feeling better and that when the school offered
3 Ciara medical services, Ciara refused them. See, Ciara was
4 smart, she didnt try to kill herself. A person of her
5 resourcefulness and intelligence knew better than to drink
6 something that would kill her if all she wanted to do was get
7 her father's attention.

8 But, of course, the school and I don't envy their
9 position, any school would have to take the position of, hey,
10 we have to look into this because, of course, they can face
11 some liability. If they turn out to be wrong, and she really
12 did try to kill herself, so they did cover their bases in that
13 letter. And Ill tell you that was a good idea on their part
14 because there were people waiting in the wings that may have
15 caused some consequences for them they had not taken the most
16 safe position on that.

17 Well, so you have the May 12th paint incident, the
18 May 15th letter, we move forward May 29th rolls around and
19 apparently Mr. Woo. He gets some report from the school, we
20 see the report and he gets some report from the school and
21 what we see in the notes he put in the notes a number of
22 things. A daughter trying to get father's attention,
23 struggling to get father's attention. Father not approving of
24 where the daughter is staying. Child's address, 1257 Pacific.
25 The person there with her Ms. Canty. He didnt write a

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1 possible address I don't know when he wrote it but it says it
2 on there, okay, its a possible address. And so if youre
3 looking for a suicidal child it's an address you check.

4 And Mr. Woo did check. He got up whether it had
5 been May 29th or May 30th he said he didnt remember. He told
6 you I said he told he didnt remember when he first met Ciara
7 she's a suicidal child that he claims he's looking for but he
8 doesn't remember when he met her. He said I don't recall, I
9 don't recall. Then he finally said, well, it must have been
10 after I removed the kids. It must have been after. Youre a
11 social worker, are you looking for a suicidal kid or are you
12 trying to do something else? What are you really trying to
13 do. Are you trying to get to a legal address, are you trying
14 it find a child that's in danger.

15 What would you expect a social work for do you would
16 expect a social worker to go to the addresses that were there,
17 go to the school. Well, you know what Mr. Woo he did go to
18 the school. I'm sorry, he talked to the school and then he
19 went to the address 1257 Pacific. He went right over there.
20 It was only two blocks from where he was working. Two blocks,
21 he could have walked. He probably didnt have to get into his
22 car, his two blocks. He went over there to the place and he
23 met with Shakeema Canty and Ciara.

24 When he came upstairs, he asked the question that
25 any social worker would ask if they were concerned, hey, why

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1 did you drink that paint? And Ciara said: Because I was mad
2 at my father. And he said why? She said: Well he's got all
3 those other kids over there and he doesn't pay me any
4 attention. And Mr. Woo suggested to her that well Ciara knew
5 that Mr. Woo was there to bring her back home to take her to
6 her father's house and Ciara didnt want to go back.

7 And so, when Mr. Woo said to her, well, maybe did he
8 abuse you sexually or something? Ciara was like yeah, yeah
9 that's it. Knowing that, as in the past, any allegations of
10 any type after because or neglect would provoke an
11 investigation and at least delay her return to her daddy's
12 house. It had been done before. As you heard in testimony,
13 ACS investigated previous claims of abuse and neglect, we
14 don't know exactly what those claims were, but within two
15 years prior to this event, one year actually in 1996, less
16 than one year from this event, ACS sent Mr. Southerland a
17 letter saying we have investigated claims of abuse and neglect
18 and they are unfounded.

19 Mr. Woo's a social worker he had access to that, he
20 worked for ACS, that was his job to look at those records. It
21 was his job to look and see if any P.I.N.S. warrants were out
22 there and there were quite few of them. So by the time he got
23 to Ciara he knew what was going on assuming he looked at that
24 stuff, assuming he had looked at the file that had already
25 been there. So when he suggested, hey, sexual abuse? Ciara

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1 took it and ran with it would prevent her from going back into
2 an environment where she felt unloved and she wasn't getting
3 enough attention.

4 Well, Mr. Woo then told her, oh, by the way, as
5 Ciara testified to sent Shakeema into shock when Ciara said
6 that. Shakeema said: I never heard her say that before. But
7 Mr. Woo kind of just changed the topic. He said, listen, I'm
8 going to go and meet with your dad. I'm going to go to his
9 house and do a home visit.

10 So the next day or so he called Mr. Southerland. He
11 said Mr. Southerland your daughter tried to drink paint, she
12 tried to kill herself, and I need to come and inspect your
13 home. Mr. Southerland said, okay, she's at 1257 Pacific, go
14 take a look go talk to her. I had these problems, she's a
15 runaway, she's not here. Well, Mr. Southerland, we still need
16 to come in here because there are other kids there.

17 Well, first of all, none of my kids are in their
18 system. Shakeema maybe in your system but Shakeema is not
19 here. Ciara is not here and so you should go maybe go to the
20 school and find out why she was drinking paint. I talked to
21 her, I talked to the school and we resolved that Ciara is not
22 suicidal.

23 Mr. Woo persisted and finally Sonny Southerland told
24 him, hey, I'm not a drug user; I'm not an ex-con. I take care
25 of my kids. You find out what's going on with my daughter.

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1 Mr. Woo characterized this as being not cooperative.

2 Mr. Southerland said, listen, Ill come up and talk

3 to you and Ill come up and talk to you and supervisor.

4 Mr. Southerland asked to speak to the supervisor. He was
5 cooperating, he wanted to talk to somebody about his child.

6 He didnt want to play the game that Mr. Woo wanted to play.

7 He understood Mr. Woo wasnt concerned with where Ciara was

8 Woo. Woo was trying to do something else. He wasnt quite
9 sure what it was at the time but we find out later.

10 And so, he ended up going there to talk to Woo is
11 Woo's notes sat with her for 40 minutes. Woo got the names of
12 all the children that were thriving there with

13 Mr. Southerland. Woo, it was confirmed, that Ciara was living
14 with a friend. But Woo still, in his notes, says that

15 Mr. Southerland wasnt cooperating. Mr. Southerland was
16 sitting in his office with him, giving him the very

17 information that Mr. Woo said he needed and that is where is

18 Ciara is me she okay? Woo never mentioned to Mr. Southerland

19 that he already talked to Ciara. Why not? Because he want

20 Mr. Southerland to know that he was trying to do something
21 else.

22 And so, you know, they had that conversation, Woo

23 claims to have gone by the house a couple times. Who knows,

24 it might be true if Mr. Southerland wasnt there. That doesn't

25 prove that Mr. Southerland wasnt cooperating you can't

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1 cooperate request you're not there. He came by another time
2 and Mr. Southerland came out with all his kids, the ones that
3 had been written down in the notes, and Mr. Southerland
4 introduced Mr. Woo to all those children who are adults now.
5 Again, there was six children: Elizabeth was three at the
6 time and so there probably wasnt an introduction; Kiam was
7 five; Venus was nine; Sonny B. Jr. was nine; Nathaniel was
8 eight; and Emmanuel, I'm not quite sure how old he, was he
9 would have been there. He was school age, he was school age.

10 So they made that introduction and Mr. Southerland
11 said, well, Ill meet with you but I can't do it right now, I
12 have to take the kids to school. And Mr. Woo said something
13 that didnt really make a lot of sense. He said, oh, well if
14 you don't cooperate I'm going to have to take court action.

15 And so, Sonny kind of blew that off what does that
16 mean I'm cooperating I don't know what you are talking about.
17 Sonny was growing more and more leery of Mr. Woo's intentions.
18 Little did he know that he was attempting to meet children and
19 do an inspection. Mr. Woo would go to the courthouse that
20 Friday and submit a false affidavit. And in the affidavit he
21 says, oh, we think Ciara Manning is in this apartment. He
22 didnt mention in the affidavit that he had met with her
23 previously. He said we think she's in that apartment. That's
24 because its her legal address.

25 Well, Mr. Southerland had one in custody and so

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1 perhaps it was the legal address but when you're looking for a
2 suicidal child you look everywhere you might be able to find
3 them. You certainly don't wait weeks to confirm that she's
4 not at the legal address.

5 Certainly, if its a runaway child, the legal address
6 is probably the last place you find her if you think about it.
7 That's where she's supposed to be her legal address but she's
8 a runaway so she's not there this confirmed by the school.
9 Mr. Southerland and Mr. Woo had come by, still put it in an
10 affidavit, that Ciara was he thought she was at that
11 apartment. He thought she was suicidal. This is what he put
12 in the petition for good measure to make sure that the judge
13 would absolutely give him this entry warrant he stuck some
14 other names in there of some children that don't even belong
15 to Mr. Southerland.

16 He testified on the stand, well, my lawyers put that
17 in there. Well, he's the one that signed under oath saying
18 that he thought that they were there he knew those names
19 weren't in his notes but what did he tell you all. He
20 insulted you all by saying I can't tell my lawyers what to put
21 in a document, a legal document. Well, you can refuse to sign
22 it if its not true. Youre signing it under oath. That's
23 perjury; right?

24 So he did submit a false affidavit he put the false
25 names in there and a judge already said, whoa, she is going to

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1 kill herself. Yes, go inside. You can have an order to go in
2 there. Mr. Woo came to the -- on the night of June -- well,
3 he got the order on June 6th, remember, he's looking for a
4 suicidal child. What did he do on the 7th? He enjoyed his
5 weekend, he's looking for a suicidal child. On the 6th he got
6 an order and he spent the whole weekend doing whatever he
7 wanted to do. The Court give him an order looking for
8 suicidal child and as soon as he got it and went and did what
9 he did on his weekend. Some child is somewhere according to
10 him in jeopardy, life and limb, enjoying his weekend.

11 He got up on Monday spent the whole day doing
12 whatever he does and came at night when the children were
13 sleeping to Mr. Southerland's apartment. All those children
14 were sleeping as you heard in testimony. I don't know what
15 time he came, it was probably after 9:00 o'clock. He violated
16 everything else. So he goes to the house with these police
17 officers and Mr. Southerland says: What are you doing here?
18 And the police officers says: Well, this guy's got a warrant
19 to come in to look for some kids. And Mr. Southerland said:
20 Well, let me see the warrant. And Woo wouldnt give it up, he
21 held on to it. Mr. Southerland finally got the cops to tell
22 Woo, hey, let him see the warrant. Mr. Southerland looked at
23 the warrant, it had Ciara's name on it and it had a bunch of
24 kids that belong to him and Mr. Southerland said, well,
25 officers, this warrant is incorrect, these kids aren't here,

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1 these aren't my kids. But Mr. Woo, going by the language in
2 the warrant, he convinced the cops to let him in any way.

3 Mr. Southerland offered the cops to come in and
4 said you'll no 16-year-old girl here and all these other kids
5 aren't here. Mr. Southerland pleaded with the cops, hey,
6 don't let this guy in my house. He's not looking for Ciara,
7 trust me. He's not looking for Ciara, he's trying to do
8 something.

9 But those cops they were bound by that order and so
10 they ultimately convinced Sonny, hey, let this guy come in
11 here to do what he's got to do. He's got an order, don't
12 worry, it will be okay. Let him come on in, he'll be gone.
13 Once Mr. Woo got in there he spent a couple minutes in there
14 he went through the rooms. He took the latch off the door
15 where the speakers were and things and he went in there. Then
16 he went in the other rooms. He says he looked in the
17 refrigerator. He didnt look in the cabinets for some reason.
18 He said he saw some dangerous conditions. He didnt abate
19 them. There was a lamp on the floor he thought was dangerous
20 he didnt even go over and try to move it to a safe spot.

21 He looked around he did an assessment and then he
22 told Mr. Southerland, oh, I'm taking these kids.
23 Mr. Southerland says why because the conditions in this
24 apartment. Mr. Southerland was, like, you lost your mind, now
25 I see what you've been trying to do this whole time. This was

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1 what you were trying to do.

2 Now, I remind you something Mr. Woo testified twice,
3 I'm sorry, he testify once and then every other witness came
4 in here and testified to this same series of events. I'm
5 telling you now every witness testified to it.

6 Mr. Woo did not get back in that chair and rebut one
7 thing said that he all that was lies. All that was made up.
8 He sat in that chair you remember he sat there he may have
9 answered one question and then he got down right away. He got
10 off that stand right way because he knew you wouldnt believe
11 him.

12 And so, the kids were out of the home. The police
13 surrounded these children as they pleaded, hey, wait we want
14 to stay. What's going on, daddy? And the best that daddy
15 have could do is go in the freezer to comfort them and say
16 here is an icee. It's going to be okay. A frozen snack. He
17 was desperate to console his children. He was distraught at
18 what was happening. He was in disbelief his children were
19 being taken away from him.

20 You recall the night before you saw a video they
21 were having a great time. It was a birthday party. You saw
22 the video everybody looked like they were having a great time.
23 They had a birthday cake they were eating they were partying.
24 The dangerous conditions, the video didnt show it. Woo
25 certainly didnt get up and say, look, there's a dangerous

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1 condition in this video. Why because there were no dangerous
2 conditions, period? There were no emergency circumstances he
3 made to up. All of it because he had an agenda. He wasn't
4 looking for Ciara when he came to take these kids. We don't
5 know why I don't want to advance a motive sick twisted
6 person's mind to do something like that.

7 Now, they took the kids from the apartment they took
8 him to some shelter. And Mr. Southerland got up the next day
9 which would have been 16 years ago today and he hasn't stopped
10 yet. Here it is, 16 years later, to the day that he started
11 fighting front of a jury for the first time for the first
12 time. He went to the courthouse every day that first week.
13 That would have been a Tuesday, right, because June 9th was a
14 Monday. He got up on Tuesday, he went to the courthouse every
15 day they had nothing down there at the courthouse. Nothing.

16 Finally, on Friday, some ACS attorney tells him
17 we're going to file something. We're going to file something.
18 There's something that's going to get filed.

19 Mr. Woo said that on Friday he got an order. He
20 never got an order he may have filed be something on
21 June 13th. He filed a petition and in that petition he lied.
22 He said, oh, he said a number of things. When said Ciara has
23 been abused since she was eight years old by her dad. Well,
24 you recall Ciara was her dad was in court trying to get
25 custody of her when she was eight all the way until she was

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1 11.

2 Mr. Southerland was fighting for his daughter's
3 safety and took care of his daughter. Certainly, if there
4 were allegations of abuse at eight years old that would have
5 come up in some court proceeding. No, Mr. Southerland was
6 awarded with custody of his daughter because he never touched
7 her.

8 But Mr. Woo put that in the petition and in the
9 petition he put her real address, finally, 1257 Pacific. I
10 wanted to show you the petition, I wasn't permitted to. He
11 lied in the petition.

12 And what else did he put in there? He said, oh, and
13 I went to the apartment and there were dangerous conditions.
14 Emergency circumstances, the kids were dirty, vile smelling,
15 no food. They couldn't walk around, there was electrical
16 cords that would shock them. A light was on the floor that
17 would have burned the apartment down. They couldn't touch the
18 lamp. This is what he put in the petition on June 13th. But
19 he didn't get an order because no judge would say, hey, that's
20 emergency circumstances. He didn't get an order.

21 You know how we know he didn't get an order? He came
22 back on June 27th and filed another series of petitions. Who
23 does that if you get an order, why would you come back if you
24 had got an order on June 13th why are you back on June 27th
25 asking for the same relief I supposedly already got? But, of

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1 course, he made a lot of people thinking he had gotten that
2 order and that's why Mr. Southerland at some point had filed a
3 claim against the judge and said, hey, Judge, you gave them an
4 order. In fact, everybody found out three weeks ago that no
5 one has ever seen the order.

6 Mr. Woo had it --

7 MR. BOWE: Objection, your Honor. Facts not in
8 evidence.

9 THE COURT: Overruled.

10 MR. KING: No lawyer has ever claimed to have seen
11 that order.

12 THE COURT: Mr. King, the jury is going to determine
13 whether there was an order and on what date it was issued.
14 You may continue.

15 MR. KING: Very good.

16 In the second petition, he made other allegations,
17 he made up an order. He didnt want those children to go back
18 and he needed an order to prevent them from going back. He
19 didnt get an order on June 27th either. He made up more
20 allegations. He said, oh, these are all these kids, Sonny was
21 beating them. So he put in the June 27th petition. Still no
22 order. No court ever in this case found that there were
23 emergency circumstances that justified Mr. Woo removing those
24 kids.

25 This case has been through several Family Court

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1 judges, Second Circuit Court of Appeals, the Appellate
2 Division, the U.S. Supreme Court. This case went all the way
3 to U.S. Supreme Court, no court has ever found --

4 MR. BOWE: Objection, your Honor.

5 THE COURT: Ladies and gentlemen, when you consider
6 this case, youre going to need to confine yourself to the
7 facts that are in the record before you, not facts that may
8 have been asserted by counsel which are not in the record.

9 Please continue, Mr. King.

10 MR. KING: The proceedings of the U.S. Supreme Court
11 are public, and so, I'm not permitted to say it today but that
12 you know your obligations to find the truth. No court ever
13 found emergency circumstances justifying the removal of those
14 children ever. No court in jury has ever even heard these
15 facts, only a judge, Family Court judge. The petition was he
16 had false statements in there. June 27th, still no order.

17 Well, what happens next? You heard Ciara testify,
18 Woo never got up and said this was not true he had an
19 opportunity he didnt get up and saying anything about
20 anything. Ciara and Ms. Shakeema Canty walked over the two
21 blocks to Woo's office for a follow-up and Mr. Woo says the
22 following: Hey, I went to your daddy's house and removed the
23 children because they didnt have food, something along those
24 lines. And by the way, Ciara, youre going to to have to
25 testify in Family Court about the sexual abuse.

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1 And that Ciara testified her heart sunk she knew
2 that wasnt true that was something she said not to go home but
3 now she was going to have to testify. She felt bad. She felt
4 bad that her sisters and brothers had been removed from her
5 home even though she resented them for getting attention she
6 testified she felt bad. She knew that there was a problem.
7 She knew she had been tricked. And she saw Mr. Woo give
8 Shakeema Canty a check for \$800. Mr. Woo never got up and
9 denied it. He never told you all about that. He never told
10 you anything about any of these conversations and then he
11 didnt get up here and say it was untrue.

12 So it was obviously true exactly what I'm telling
13 you. And so, Mr. Woo says you're going to get a letter
14 telling you what day to come in.

15 Lo and behold the hearing comes around.
16 Mr. Southerland testified he was there, none of these children
17 were there. Supposedly someone came in on their behalf and
18 testified on their behalf, a law guardian. No one ever asked
19 these children. You heard the children testify: My daddy
20 never abused us.

21 But some law guardian came in there and said it that
22 judge, oh, those kids have been abused. We asked them they
23 said they've been abused that is what a law guardian did on
24 their behalf. A law guardian what does that even mean if you
25 can go do that. Ruin their lives.

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1 And what did the law guardian tell Ciara, hey, Ciara
2 you need to go here and say that your daddy abused and
3 threaten today kill you or else you will P.I.N.S. warrants and
4 for criminal infractions you have recall open cases.

5 Well, Ciara as bad as she may have felt about it,
6 she knew she didnt want to go to jail she was 17 years old
7 facing some serious charges and so she got up there and
8 reluctantly said things, hey, he did it. You heard testimony
9 that the Family Court judge actually just asked her the same,
10 you know, asked hire a series of questions.

11 MR. BOWE: Objection. Not in evidence, your Honor.

12 THE COURT: Ladies and gentlemen of the jury,
13 lawyers say things during closing arguments. When you make
14 your determination you need to rely only on the facts in
15 evidence. Everyone had an equal opportunity to present
16 evidence.

17 Please continue, Mr. King.

18 MR. KING: It is in evidence that is that the Family
19 Court judge testified for Ciara. You are all Mr. Southerland
20 say to I don't know what that guy is talking about.

21 So Ciara had got on the stand she probably did
22 incriminate her father. You would be happy to know that
23 although she made that up, maybe there were some police
24 officers standing around her nobody granted them. Nobody
25 grabbed him and arrested him. Everybody in that courtroom

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1 knew that it was made up. Nobody touched him and he's never
2 faced any criminal prosecution because it was made up.

3 At the end the Family Court judge, not a jury like
4 you, a Family Court judge who would testify on behalf a child
5 who would listen to law guardians and not take the testimony
6 of the actual children involved, ten years old, nine years
7 old, eight years old certainly can come in here and safe
8 whether they had been abused or not they didnt come.

9 A judge, one judge, decided the fate of all of them,
10 slandered them but their names down as abused. Said that
11 Ciara was abused. And then a judge made a derivative finding
12 that essentially implying that Sonny abused sexually all of
13 them. His three-year-old daughter, his five-year-old son; his
14 other two sons; his 10-year-old daughter. One judge had that
15 power and actually put it down because of some law guardians.
16 This is in the Family Court, people.

17 But it wasnt true. You heard every child testify he
18 didnt touch me, the only time I was abused was in foster care.
19 We only feel safe at our daddy's house. Once we were in
20 foster care, we knew we weren't in our daddy's house for sure.

21 Not one child came in here and told you they were
22 hit abused any way. How could Elizabeth abuse she was three
23 years old what is what was beat A-3-year-old. Its slanderous,
24 defamatory. Its made up. Youre a jury, youre smarter than
25 that. You have the power today to decide what's the truth.

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1 You don't have to listen to a Family Court judge
2 that would treat them like that. You could ignore what he
3 said. It was either true or to wasnt. And so what happens
4 next? They're away from their daddy. And daddy got up fought
5 every day to bring them home.

6 And finally they started trickling back. But daddy
7 had filed a lawsuit, 1999 and here we are today for the first
8 time in front of a jury, not one judge. There is a judge
9 there but youre the jury you decide the facts today. You have
10 the power today. You saw Woo sitting up there if he was
11 credible then he wins, period. If Woo was telling the truth
12 he wins.

13 But if these witnesses were telling the truth then
14 there's no way Woo can win he lied to you about everything he
15 said up there. You saw him he could pick at his face he was
16 looking over at his attorneys he I had to tell him hey I'm
17 over here. He said "I don't recall" probably a hundred times,
18 I don't recall. How do you not recall the day you meet with
19 the girl that you thought was suicidal in your investigation.

20 How do you not recall whether there was any
21 testimony given on Friday June 17th why are your notes, why
22 doesn't it have intention of that. Maybe somewhere else he
23 never brought you another set of notes maybe written notes I
24 was allowed to show signature there that's my name and it says
25 date signed but that's not my signature and so you never got

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1 to see what was in those notes. He denied they were his, hey,
2 well never know what was in thinks notes you will never know
3 listen jury you have to find the truth. That's your
4 obligation, you don't have to check your common sense at the
5 front door of this building. Use your common sense. That's
6 the power you have today to establish once and for all the
7 real truth. And so, Mr. Woo tells he told a very different
8 Stoer when he was on the stand lets find out if that could be
9 true.

10 So lets see if Mr. Woo even tells you the truth.
11 This is his Exhibit 1.

12 This is the first thing Mr. Woo brought to you to
13 try to prove his case and you'll recall he was testifying his
14 lawyer was asking him do you see there the initials of the
15 subject child and Mr. Woo said, oh, yeah, the initials there
16 are there for Ciara Manning and you recall I stood up there
17 and said wait there's nothing there the initials Ciara Manning
18 and the lawyer said, oh, wait a minute that's on another page.
19 And so, Mr. Woo looked at the piece of paper and pretended
20 like something was there that wasnt. The very first thing he
21 says to you all was a lie. He presented his case starting
22 with a lie this document.

23 At the end, he says this is the report he got. This
24 is the report he got supposedly from the school. Why did he
25 leave out the address that he had in his notes why did he

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1 leave out Ms. Canty's name. None of that is in there. Why
2 did he leave out he did mention that she may be standing out
3 of the home and in an improper by this time he made this
4 document.

5 MR. BOWE: Objection, your Honor.
6 Mischaracterizing the evidence. This was the report from the
7 state.

8 THE COURT: The jury will have to figure out what's
9 being accurately stated and what's not.

10 MR. KING: They're saying this is report from the
11 state how does report from the state, her name was wrong.
12 They spelled the name wrong. That is what that lawyer just
13 said. The state, the school, sent this. SM, the school knew
14 how to spell Ciara's name. That's it starts with a C, and so,
15 this document obviously it doesn't come -- this document has
16 been created by someone but we don't know where they got that
17 information from. It certainly wasnt from the school.

18 Now, again, this is, I said earlier, that the letter
19 was dated May 16th but it was actually May 16th I apologize.
20 It says there on May 12th Ciara drank a cup of paint it says
21 she did not know it was toxic. Well, we know she did know
22 nontoxic because Ciara was no dummy. She knew what she was
23 doing at that time. She didnt realize what was going to
24 happen when Woo got involved. You see right at this point
25 Ciara seems to be feeling better. We would recommend an

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1 appointment Ciara stated she would be willing and might be
2 more comfortable in outpatient setting. Ciara was making the
3 decision herself whether to go to the hospital.

4 You look at the paragraph above that, Ms. Jones, the
5 contact, said you attempted to take Ciara evaluation but Ciara
6 refused to go and threatened to runaway if you tried take her.
7 Now this doesn't mean Ciara was living with Mr. Southerland.
8 The school knew that Ciara was what Mr. Southerland thought
9 improper environment. That was an insult to your negligence
10 when somebody runaway from your home.

11 So I'm just going to go through a couple of things
12 that Mr. Woo said. I'm almost done here actually.

13 Mr. Woo said that he was required to take the
14 children out of the home but you heard Ms. Durant who was very
15 credible she said, no, no what he was required to do was abate
16 the circumstances. She said several times if there was no
17 food he was supposed to go and buy some.

18 If there was a dangerous condition like a lamp on
19 the floor he was supposed to remove it. Certainly, if there
20 were things stacked improperly in a dangerous way he was
21 supposed to put a lock on the door arrange the material. What
22 did Woo tell you, I didn't do that because Mr. Southerland had
23 not been cooperative. Mr. Southerland had come to your
24 office, sat with you, introduced you to all his children. He
25 told you where his daughter was, but you still didnt have

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1 information you wanted. You didnt have what you wanted. He
2 didnt have what he wanted and so Mr. Southerland wasnt
3 cooperative. What did he really he want? He wanted those
4 children out. We don't know why. We don't need a motive we
5 could tell from what he did what his intentions were. What he
6 intended was what he got. He got the children out of the home
7 they didnt come back for a long time. He had to file a false
8 petitions make up dangerous conditions, pretend like a
9 supervisor forced his hand. No, you heard from a supervisor,
10 no supervisor would have forced his hand. No supervisor came
11 into this courtroom and took responsibility for what he did.
12 No supervisors came in. We wanted to talk to Mr. Balan but he
13 didnt show up.

14 The lawyers talk about legal tactics, why wasnt he
15 here if he was going to help the testimony, he didnt want to
16 waste your time. He wasted your time on everything else. Why
17 not put a person up there that could make the case for them
18 that person didnt want in the courtroom nobody is going to
19 take responsibility for that no court ever counseled there
20 were emergency circumstances because there weren't.

21 None of those social workers that came with Mr. Woo
22 came to this courtroom and said, oh, yeah there was emergency
23 circumstances we agreed. They're not in here. Mr. Woo was up
24 there by himself the whole name nobody came in here testify on
25 behalf nobody came agree with him. Guess what, no courts

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1 found there were ever emergency circumstances. Not Turbow,
2 not Judge Ambrosio, not Judge Knipps, not any other court
3 whether the highest court in the land, not even this court.

4 So lets talk about his notes.

5 He refers you to his notes. Everything that he said
6 happened is not in there. The things that are in the note,
7 okay, yeah there was a conversation with Sonny, fine, we know
8 that. He gave the names of names yeah he came to the office
9 yeah what about the part Mr. Woo about you going to the court
10 and getting an order to might written notes where are those?

11 You didnt see them did you? They never came up
12 there on that screen. Might be in my written notes no written
13 showing all this stuff he did an investigation of the child
14 that was suicidal but he never sold you anything in his notes
15 that reflect that or going to court or any of that.

16 Legal address Woo looks for legal address gone
17 through that.

18 I thought it was interesting that there was some
19 question of whether Mr. Southerland had somehow removed some
20 transcripts. The inference was hey the transcripts would hurt
21 him so that's why they're not over there. Mr. Bowe came in
22 here and told you that. He didnt tell you that he sent an
23 e-mail two weeks ago saying that they had them but they lost
24 them on 9/11.

25 Now --

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1 MR. BOWE: Objection. Mischaracterizing the e-mail
2 and facts not in evidence.

3 THE COURT: The jury's got to figure this out don't
4 keep making those objections.

5 MR. KING: My obligation is to bring the truth out.
6 Objections notwithstanding the truth is what you have to find.

7 Yeah, if we can't find the truth this is just a
8 silly game like Judge Ambrosio played isn't it. You're a jury
9 your responsibility like his is to find the truth. And so
10 what's in your hands.

11 I want you take a look at that manual that's in
12 evidence when you go back there Woo said that you'll call for
13 him to do. Any of it. When you investigate a suicidal child
14 where do you go? You go to the child, you assess her home
15 environment, and you go to the parents. You think the child
16 is abused and neglected. You go to the parent and the child.
17 You find out what's going on if there is an allegation. You
18 investigate it, you don't just keep going to the legal
19 address, especially if you know the child is not there.
20 That's what Woo wasn't looking for Ciara.

21 Okay. So I want to talk to you all about damages.
22 I spent a lot of time on that stuff just take a few minutes to
23 talk to you about damages. Okay. Damages are hard you have
24 to find out how to compensate the plaintiffs in this case for
25 what happened. The jury instructions will give you some

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1 information on how to do that. It doesn't make it easier you
2 still come up with a number even though there were no numbers
3 in the jury instruction.

4 So how do we go about doing that? Well, when it
5 comes to compensatory damages, you can consider a number of
6 following things. You can consider the personal humiliation
7 that all the plaintiffs experienced because of someone coming
8 in her home, taking them out, saying that they're dirty not
9 eating and they're abuse I had by their testimony. You can
10 any about the personal humiliation Mr. Southerland faced in
11 his community because of that.

12 (Continued on the next page.)
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KING/SUMMATION

1 MR. KING: You can think about the personal
2 humiliation Mr. Southerland faced in his community because of
3 that. Obviously, walking around, somebody thinks he's an
4 abuser of his kids. That hurts him. And it hurts the kids,
5 too, because it make him less resourceful.

6 People don't want to give him a job. You heard he
7 had to quit his job and of course, once a Family Court Judge
8 Ambrosio says, "Oh, you did this," who's going to hire him?

9 Personal humiliation, also impaired reputation of
10 all of them. They're in school. People were like, you were
11 abused sexually and beat by your dad. That's embarrassing.
12 It's embarrassing for -- it's humiliating for Mr. Southerland,
13 also.

14 He lost his wages. You heard he got -- he had just
15 got a new promotion. He had to quit that job in order to go
16 and get his kids back. He had to learn how to be a lawyer.
17 He had -- he fought to get his kids back. And he's finally
18 here today. Hasn't worked since. This is all he's done in
19 the last 16 years.

20 You can consider it mental anguish and suffering.
21 Just imagine being ripped from your parent's care and put into
22 some strange new environment. Some cops came in surrounded
23 them, took them from their daddy as they said, "Wait. We want
24 to stay." They didn't get to come back to his care for a long
25 time, and they were scared in those other environments and

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1 mistreated.

2 So that's personal humiliation, mental anguish and
3 suffering, impaired reputation, the inconvenience of it all
4 and emotional distress. And you'll see the jury instructions
5 mention that specifically.

6 If they experienced emotional distress from these
7 events, you can consider that, even though there was
8 emotional -- that emotional distress extended beyond the Court
9 Order. Remember, this is a court order that didn't affirm the
10 reasons for the removal. This is a Court Order that says they
11 don't get to come back. Just think about it, the emotional
12 distress that arose from all of this, you get to consider it
13 in formulating damages.

14 Now, I said all that and I'm not sure that puts a
15 number in your head. As a matter of fact, I'm pretty sure it
16 doesn't. And so what I want to do is, you can also consider
17 punitive damages. That is, you find that Mr. Woo was acting
18 maliciously or that he showed any type of indifference to
19 their Constitutional rights, you can find punitive damages.

20 Punitive damages, you don't even have to find
21 compensatory damages to find -- you'll see it in the
22 instructions. You'll hear it and you'll read it. You don't
23 have to find compensatory damages. You can actually just find
24 punitive damages. So maybe that's a good place to start to
25 try to come up with a number because there is a standard for

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1 punitive damages that may help you come up with a number.

2 The standard is, punitive damages are to punish and
3 deter anybody else, including Mr. Woo, from ever trying this
4 again. So we have to come up with a number that would deter
5 Mr. Woo from ever doing that again or anyone else, because
6 when they see that number, they'll say, wait, that's not worth
7 it. I'm not going remove kids without circumstances. I'm not
8 going to play this game Mr. Woo played.

9 Well, how much is that? I submit to you that you
10 start off in the punitive damage section. Mr. Bowe said he
11 didn't think you get there. If you do find yourself there, I
12 want you to go to the first line, and you would need to put a
13 number there that's sufficient to punish Mr. Woo for this
14 heinous, cruel game he played. It took 16 years to correct.
15 Sixteen years to the day is a cruel and heinous game. You
16 need a number that's sufficient to deter anyone else from ever
17 trying that again.

18 How much is that? On that first line for Mr.
19 Southerland, Sr., in order to deter and make sure this never
20 happens again, you need to put \$25 million. On the next line,
21 \$25 million, 25 million, 25 million, 25 million, 25 million.

22 I want you to keep in mind, look at me. I don't get
23 a penny of that. The lawyers don't get that money. It
24 doesn't come to us. So I'm not interested in that money per
25 se, because it doesn't come to me, but the purpose of punitive

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1 damages is to prevent anybody from ever trying that again.

2 It reflects how much we value family rights. It
3 reflects how much -- how much we're willing to impose on
4 someone like him if he ever tries it again, and it's an amount
5 we hope that will prevent anyone from ever trying something
6 like that again.

7 Now we have that number, I'd say go back up to the
8 compensatory damages and put the same amount: 25 million,
9 25 million, 25 million, 25 million. I tell you what. You can
10 go higher you if want, not sure that going lower is sufficient
11 to deter.

12 One thing about this case that makes it difficult is
13 this is the first time that anybody ever got do a jury on
14 this, so you all have to decide something that perhaps no
15 other jury's decided before. You have the power to do it.
16 You have the power to restore them to where they were. Their
17 Constitutional rights, no amount would ever make them whole.
18 But it's your job to find the truth and to provide
19 compensation and also to deter and punish this heinous,
20 callous, reckless action taken by Mr. Woo.

21 That concludes my comments. I thank you.

22 THE COURT: Thank you, Mr. King.

23 Ladies and gentlemen, you need another break or you
24 want to go on? Let's go? Okay.

25 Mr. O'Neill?

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1 MR. O'NEILL: I could use a five-minute --

2 THE COURT: Mr. O'Neill needs a five-minute break.

3 There's no such thing in law as a five-minute break. Let's

4 take seven minutes. Be back here at 12:15. Please do not

5 discuss the case amongst yourselves nor with anyone else. See

6 you very shortly.

7 (Jurors exit.)

8 All right, 12:15.

9 (Recess.)

10 THE CLERK: All rise.

11 THE COURT: All right. Let's have the jury, please.

12 (Jury enters.)

13 THE COURT: All right. Be seated, please.

14 Mr. O'Neill, you may proceed.

15 MR. O'NEILL: Thank you, Your Honor.

16 Good afternoon, ladies and gentlemen.

17 JURORS: Good afternoon.

18 MR. O'NEILL: In the United States of America, if a
19 government official enters a private home and takes a child
20 out of that home against the wishes of his or her parent, that
21 official needs to have a very clear explanation of what the
22 emergency was.

23 Mr. Woo doesn't want to talk to you about that. He
24 got up here, by his attorney, and what he wants to talk about
25 is Ciara Manning's sexual allegations over and over and

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1 over again even though when these first were introduced into
2 evidence, Judge Cogan instructed you and he'll instruct you
3 again, they are not relevant. The Family Court proceedings
4 that took place after the removal are not relevant to whether
5 or not Mr. Woo violated the constitution of the United States
6 of America, when he removed my clients from their home without
7 a court order.

8 So I pose the first question that you ought to ask
9 yourself, why does Mr. Woo want to spend so much time on
10 evidence that isn't relevant to the most important fact that
11 you have to decide in this case. The fact that is, win or
12 lose, why does he want to do this. It's an easy question to
13 answer. It's scandalous. It's ugly. It attacks the people
14 that are suing him. And it's a distraction. It's a
15 distraction to take your mind off of what this case is really
16 about.

17 Now, something else Mr. Woo's attorney, in the hour
18 and-a-half that he stood here and talked to you, didn't tell
19 you, but Judge Cogan will tell you, that when children are
20 removed from a home, without a court order, there's a
21 presumption that it's illegal. And that presumption is enough
22 for my clients to carry their burden of proof. That's all
23 they need to prove, is that the removal was without a court
24 order.

25 Mr. Woo's attorney wouldn't tell you that.

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1 Mr. Woo can defeat that presumption by showing that
2 there was an emergency. But he doesn't want to talk to you
3 about an emergency, he wants to talk to you about Ciara
4 Manning's sex allegation case in Family Court.

5 Now the first claim is the illegal search claim.
6 And I'll get back to the removal in a emergency circumstances,
7 but I'm going to spent a very short time on the illegal search
8 claim because I think it is a deceptively simple issue.

9 The question that you will decide, and Judge Cogan
10 will give you the instructions, did Mr. Woo lie in his
11 application, either intentionally or recklessly. And were
12 those misstatements or lies or reckless misrepresentations a
13 factor? Did they result in the order being issued which
14 allowed them to go to the Southerland home.

15 Now Mr. Woo admits that the application that he
16 signed under oath was not accurate. And he's remarkably
17 unconcerned with that fact. Even though he signed, you can
18 look at the application -- he signed his name twice. He
19 signed his name where -- under the statements. Then he signed
20 a separate section in which he said, I swear to tell the
21 truth. And that everything here is true to my knowledge, or
22 based on information that I believe to be true. And then he
23 gets up here, on the stand, taking the same oath, to tell the
24 truth, under penalty of perjury. And he says, oh, the names,
25 some lawyer wrote them. As if it's no big deal. Whatever,

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1 right? Just whatever. Let me have a court order so I can get
2 into this house, names shames, I don't care.

3 Well, that's recklessness by his own testimony. But
4 there's something else here. You may recall that I asked him,
5 because in his deposition -- and by the way I don't have
6 transcripts, you have to pay for those, and they're very
7 expensive. And we don't have transcripts from trial
8 testimony, I'm relying on my memory. And you'll have to rely
9 on yours, or you can have transcripts read back. But I asked
10 him, at your deposition you testified you were actually
11 thought those Manning kids were the apartment. Now you're
12 saying oh, if I had seen that these were different names, I
13 would have had the lawyer correct it. Why is he talking out
14 of both sides if his mouth here? And it's consistent with
15 what he did on that application. It's whatever. Whatever I
16 need to say, I'll just say it. Because I need to get into
17 that apartment, and I want that court order.

18 I don't want to waste anymore of your time talking
19 about whether Ciara Manning tried to commit suicide, or the
20 paint, or where she was living or any of those things. I
21 going to talk to you about what Mr. Woo admits he knew.

22 He certainly admitted that he knew she wasn't living
23 at the Southerland home. But it's official address or not,
24 but he knew she wasn't there and wouldn't be found there.

25 I'm really more interested in what he left out of

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1 that application. Because sometimes what you leave out is
2 more important than what you put in. So what I've done is
3 I've created, using facts that Mr. Woo has admitted to, that
4 don't depend on anybody's testimony but his. And if he had
5 gone to the Family Court, and made a truthful application and
6 told the judge these are the facts that I know of, can I have
7 an order, this is what he would have said.

8 Ciara Manning drank some nontoxic paint in school on
9 May 12th and she may have expressed some ideas about
10 committing suicide. The school believes that she is
11 emotionally disturbed and is concerned that she is not getting
12 the psychological, or psychiatric care that she needs. Her
13 father has legal custody. But she is living out of the home
14 and the father has limited control over her. I need to
15 conduct a home visit of the home of Ciara's father, because
16 that is what I am required to do. It's her official
17 residence.

18 MR. BOWE: I've stopped by that home several times,
19 but the only time Mr. Southerland was there he was taking his
20 other children to school. So it was impossible to do a home
21 visitation then.

22 The father has come to the ACS office to meet with
23 me, and he agrees to permit a home inspection if we can set up
24 a date and a time for it. I do not want to make an
25 appointment with the father, however, I want to conduct a home

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1 visit whenever I happen to show up. Therefore, please provide
2 me with a court order so I don't need Mr. Southerland's
3 permission to enter his apartment, and so that I can have the
4 police use of force, if necessary.

5 That's what a truthful application would have
6 sounded like. Put yourself in the position of a Family Court
7 Judge. Like any Judge, sworn to protect the constitution of
8 the United States, including the fourth amendment right to be
9 free from unreasonable search. And you read this affidavit,
10 and you say, Mr. Woo, are you out of your mind? You want me
11 to give you a court order allowing the police to breakdown
12 this man's door because you don't want to make an appointment?
13 You don't want to tell him when you're coming by so he can be
14 there and meet you? No, Judge, no, Judge, who has the least
15 respect for the law, rule of law, and the constitution, is
16 going to sign such an order.

17 Mr. Woo knows that, and that's why his attorney told
18 you that, well it was unrealistic to expect Mr. Woo to accept
19 an arranged visit. He needed a surprise visit. Oh, really?
20 Evidence, evidence of that fact, none. The suggestion is that
21 if you alert Mr. Southerland that ACS is on his heels, or
22 looking at him, he's going to hide something. Mr. Southerland
23 went to the ACS office on May 30th. He met Mr. Woo when he
24 was coming out of his apartment on June 4th. He knew that
25 Mr. Woo was coming by to see him. If he was going to cover

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1 his tracks, he'd already had a week to do it before Mr. Woo
2 even went into the Family Court.

3 Ms.Durant, the witness that I subpoenaed because she
4 gave testimony useful to my case, contrary to what you heard.
5 She didn't say anything about surprise visits. She didn't
6 testify that that's standard operating procedure. You'll have
7 the entire book field manual. And as a matter of fact, when I
8 heard this argument made to you, I thought maybe there's
9 something in the field manual. So this is on chapter four,
10 page 11, and it says, the length of time to complete an
11 assessment varies with each case. Although information is
12 presented here in terms of the initial field visit, most cases
13 require several visits.

14 So obviously, surprise is not a big element to the
15 assessment. And you won't find it, you will find nothing in
16 this manual. You can read the entire manual. There is
17 nothing there that says you have to make surprise visits.
18 Don't let them know you're coming. Because this is not the
19 FBI. This isn't the police. This isn't somebody
20 investigating a crime. Nobody's accused of dealing drugs or
21 engaging in some other illegal -- it's just an assessment of
22 the home. There's been no evidence that any of his kids have
23 ever been abused or neglected, other than Ciara. And she's
24 not living there. So the surprise visit is a red herring
25 because Mr. Woo doesn't want you to focus on the facts which

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1 he has basically largely conceded to you.

2 So now, I want to turn to the removal issue. Really
3 there's only one issue here. Was there an emergency? We all
4 know what an emergency is. Emergency is something that
5 requires immediate action. What do we usually do when there's
6 an emergency? We usually call 911. That's the sort have
7 thing -- that's the sort of situation that is an emergency.
8 You'll hear the term eminent harm. That there was an
9 emergency if the children faced eminent danger, or danger of
10 eminent harm. Well I decided to look up the word eminent.
11 What does it mean? The most common definition, the first one
12 that I found, and the one that most dictionaries agree on.
13 About to happen. About to happen. And I want you to think
14 about that and take that definition back to the jury room with
15 you. As you assess these things that Mr. Woo wants you to
16 find were emergencies. Were they about to happen? What was
17 about to happen? He never even told us what was about to
18 happen.

19 You know when I hear about an emergency, or an
20 eminent harm, I think of those old movies where you got the
21 fair maiden, she's tied to the railroad tracks and the train
22 is coming. That's eminent harm. If you don't do something,
23 and you movie always says, you know, six seconds, five
24 seconds. Something bad's going to happen. But if you have
25 the same fair maiden tied to the railroad tracks at noon and

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1 you know that the next train doesn't come 'til 9:00 p.m.
2 eminent harm, not emergency. Situation to take care of?
3 Sure.

4 But the issue in this case is emergency. And I want
5 to focus you back on that because we heard so much noise about
6 what a horrible family this is. And Mr. Woo kept attacking
7 this family. The issue here is whether there was an
8 emergency. And the fact that you might disapprove of the
9 condition of that apartment, or it could have been better, or
10 you might not think this is the best family. None of those
11 are emergencies. This is the United States of America. We
12 don't remove people from their homes without a court order,
13 except in very rather circumstances. That's what Ms. Durant
14 told you. That's the most important thing that she told you.

15 Remember, she didn't work on this case. She
16 admitted that. She had nothing to do with this case. None of
17 her testimony about the facts of this case were testimony
18 about what happened. If anything, it was maybe her opinion,
19 but it really wasn't that because it was asked in a
20 hypothetical. If you encounter this, you encounter that. But
21 the one thing she told you that was so important, it's very
22 rather to remove children without a court order. Because you
23 almost always have time to get a court order. And consider
24 that, when we review these conditions in the home. Was
25 something bad about to happen that couldn't be alleviated at

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1 the spot, right then and there. And that couldn't wait for a
2 court order.

3 Now the answer to that question is so just
4 agonizingly simple. That Mr. Woo has done everything possible
5 to distract you from that essential question. And talked to
6 you about these really tragic, and ugly, and sad, and
7 unfortunate allegations. True or untrue it's a tragedy, but
8 it's not relevant to the determination that you must make with
9 respect to Mr. Woo's conduct. And he's the one on trial
10 today. Not Ciara Manning.

11 So let's go talk a little bit about some of these
12 conditions. Lack of food, okay. What was about to happen?
13 First we don't know if it's true, because he never looked in
14 the cupboard which I just thought was, you know, incredibly
15 arrogant of him. To say I'm removing these children because
16 you don't have enough food based on what's in your
17 refrigerator. I don't care what you have got in your
18 cupboard. The kids are asleep. Nothing was going to happen.
19 They had already eaten that day. Nothing -- they weren't
20 going to face any eminent harm because of whatever was in or
21 not in their refrigerator for the next ten or 15 hours. It
22 was school night, they were going get up in the morning.
23 They're going go to school where you get breakfast in New York
24 city. They're going to stay in school and have a lunch, where
25 you have lunch in New York City.

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1 And the first time that this food condition, as
2 we're told, would be at all an issue to them, would be when
3 they were to have dinner the next day. Time for a Court
4 Order? You betcha. Now, imagine a Family Court Judge. I
5 want to remove six kids because the food is -- the
6 refrigerator is a little light on food. I know what Ms. Duran
7 said, buy them some food. Keeping the family together, that's
8 our first objective. We don't take kids out until we move
9 heaven and earth, done everything we can do to keep the family
10 together.

11 By the way, very interesting fact. I didn't hear
12 any testimony, and it's your memory, but I didn't hear any
13 testimony that when Mr. Woo rescued these kids from a home
14 without enough food, that he got them something to eat. I
15 didn't hear that. Maybe I missed it. But I don't recall any
16 such testimony. And Mr. Woo somehow magical knows that the
17 last time they eaten was three o'clock. I don't know how he
18 knows that.

19 Now, I suppose he would say that the kids told him?
20 Really? You got kids from three to nine years old, woken up,
21 out of their slumber. And they're going tell you when they
22 ate, kids pay attention to when they eat? I mean that's
23 preposterous. We know kid at that age don't pay attention to
24 time.

25 Next item, extension cords. I mean, just baffled

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1 when I hear this one. Mr. Woo admitted they're insulated.
2 What's the danger of having extension cords? If they were so
3 dangerous they wouldn't be sold. Everybody uses extension
4 cords. UL approved, plug them in. Get power from here to
5 there. That's what they're for. And he didn't tell what the
6 danger was. I didn't hear it. I mean, there's some talk
7 about, you know, I don't know what -- fire, electricity. How?
8 Extension cords don't cause fires unless there's something
9 wrong with them. You can see that, he didn't testify to that.
10 He didn't testify how they're used. He didn't testify what
11 they were plugged in, where they went, what they were plugged
12 in to. He just said extension cords, and he just wants you to
13 say, yes that's emergency. Hey, unplug them. That's the
14 problem.

15 Equipment thrown haphazardly into a room. I don't
16 believe that it can't be moved. And why do I say that?
17 Mr. Southerland used that equipment in his livelihood. He was
18 an engineer. He did DJ I believe.

19 (Continued on the next page.)
20
21
22
23
24
25

O'NEILL/SUMMATION

1 (In open court.)

2 MR. O'NEILL: These are the tools of his trade, it
3 doesn't make any sense. You're all people with common sense.
4 Does somebody throw his tools, delicate electronic equipment
5 in a pile when he needs to use this for his livelihood. Just
6 like as a garbage heap. His description on furniture over
7 furniture, furniture; right. That doesn't make any sense.
8 That's the sort of thing you take good care of especially if
9 you are a person of very modest means which this family most
10 certainly was.

11 So now we get to the dirty clothes. No emergency
12 there, I don't think you have to spend any time on it.

13 Now, let's turn to the what Mr. Woo's attorney told
14 you was at the heart of the lawsuit. Remember him telling you
15 about Venus's cut? The heart of this lawsuit because
16 allegedly Venus changed her testimony from I'm not, I think it
17 was something like either probably or I think so to no. By
18 the way, she didn't deny her foot was cut, the question was
19 were you limping. Not whether your foot was cut. I mean,
20 okay.

21 But the heart of the lawsuit. When I asked Mr. Woo
22 what were the reasons the kids were removed, he didn't even
23 mention the cut on Venus' foot. That didn't come up when I
24 questioned him. So when I sat there and said: Tell us all
25 the reasons she was removed, this reason, which you're told

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1 today is at the heart of the lawsuit, he didnt even remember.
2 Somebody's trying to sell you a bill of goods here, okay?
3 Somebody is trying to sell you this bridge that goes over to
4 Manhattan with arguments like this.

5 Nobody called an ambulance for this cut. There was
6 no testimony of any medical treatment. I think Woo said he
7 heard that she got a tetanus shot. Where is the medical
8 records? You can't give a child of nine years old medical
9 care without documenting it. Obviously, that's required.
10 Where was it? Her testimony was that her father had cleaned
11 the cut, put a Band-Aid on it. Seems reasonable to me.

12 Now, lets get to the lamp, the famous lamp. And we
13 have heard so much testimony about the lamp that almost burned
14 down the Southerland building. And I asked Mr. Woo why
15 couldnt you move the lamp? Remember his answer was, well,
16 there was nothing to put on it.

17 Now, the argument made to you today is that
18 Mr. Southerland is a stubborn man and he would just keep
19 putting the lamp back down on the floor. That is not what
20 Mr. Woo said. Mr. Woo said there was nowhere to put it. So
21 what I'd like to could do, ladies and gentlemen, is I'd like
22 to show you some still pictures from Exhibit C-1 which was the
23 video.

24 (The above-referred to exhibit was published in open
25 court.)

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1 MR. O'NEILL: Now, here's Kiam. What is he sitting
2 on? One of those crates you see all over the place. The
3 crate could easily have been moved and put into the bedroom
4 and the lamp could have been put onto the crate, okay? This
5 one is a little tough to see but its in evidence. This is
6 Mr. Southerland's mother sitting on the couch, and next to her
7 you can just barely see it, I apologize. This is a speaker
8 and that's a cup, a drink, sitting on top of the speaker.
9 Could have taken one of those speakers and put it in the
10 bedroom, put the lamp on that. Here is a white table, looks
11 very portable. And back here, you can hardly see it, here are
12 a number of chairs that could have been put into service if
13 really need be.

14 So Mr. Woo would have you believe that he actually
15 considered moving the lamp but concluded that it was
16 impossible because there was nothing to put it on. I think
17 this is another example of Mr. Woo willing to say whatever. I
18 swear to say whatever seems to be the oath that Mr. Woo
19 follows when it comes to courts and proceedings regarding
20 childcare.

21 Now, we heard that Mr. Southerland's continued
22 refusal to accept help was also on Mr. Woo's mind. We didnt
23 hear that from Mr. Woo. This is what Ms. Durant said would be
24 a consideration. Would be in the hypothetical. She wasnt
25 there, she doesn't know anything about it. Mr. Woo was there,

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1 he never testified that Mr. Southerland's continued refusal to
2 accept help or to help Ciara was on his mind when removing the
3 kids. It certainly didnt make anything an emergency.

4 You know any home has got potentially dangerous
5 conditions. Say youre in the middle of cooking and the ACS
6 person comes in. Oh, you got some sharp knives on that
7 counter and you got a stool here a kitchen stool. The
8 nine-year-olds, they have could climb on that stool and get
9 that knife. You got a china cabinet and its got some things
10 that, if you got a couple of nine-year-olds wrestling they
11 could knock that cabinet over and all that stuff could fall
12 out and hit them.

13 There's no limit to the number of scenarios you can
14 cook up by which a kid could get injured in a home, that's why
15 kids need supervision. There's no allegation of inadequate
16 supervision here which is, if you look at the manual, the
17 prime consideration be adequate supervision. You can never
18 make any home one hundred percent child proof, that's why you
19 need to supervise them. There was no allegation of inadequate
20 supervision.

21 Indeed, if all it took to remove kids from a home
22 without a court order was to formulate some scenario, some
23 hypothesis where something could happen, the requirement to
24 get a court order would be meaningless. It would just turn
25 into an option for the case worker. A case worker could go

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1 into any home and say: With these conditions, without
2 supervision, and, by the way, the parent is very stubborn, we
3 got to take these kids out. Its a carte blanche its not what
4 the constitution permits.

5 Now, there's another red herring which has been
6 floated before you which is the cumulative effect of these
7 conditions. Why do I say its a red herring? Well, classic
8 example of cumulative effect is the straw that broke the
9 camel's back. Every straw is very light, but you keep adding
10 and adding to becomes an insufferable burden and the animal
11 breaks down.

12 In this case, the conditions cited by Mr. Woo did
13 not accumulate. In other words, the dirty clothes did not
14 make the equipment more dangerous. The equipment did not make
15 the lamp more dangerous. The lamp didnt make the condition of
16 the food more dangerous. The food didnt make the extension
17 cords more dangerous.

18 So this idea is that you got to add all of this
19 together is just a fallacy. It's an attempt to mislead you.
20 Its illogical. Again, I want to bring you back to the
21 definition of imminent harm, about to happen. That's what it
22 means. I talked to you a little bit about quality of
23 evidence. What do I mean by quality of evidence? What did
24 the parties bring? I think its fair to say everybody here
25 wants to win their case. And youre going to bring your best

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1 evidence that you can, you really should.

2 Now, we heard from Mr. Woo about all sorts of
3 evidence that supposedly exists but he didnt want to bring to
4 you. I was flabbergasted when he decided not to call
5 Mr. Balan to the stand. First of all, he promised you that
6 you would hear from Mr. Balan. All through the trial, he kept
7 saying: Mr. Balan said this, Mr. Balan said that. My
8 supervisor, my supervisor, my supervisor. And like Mr. King I
9 was looking forward to having a conversation with Mr. Balan.
10 I had some questions to ask him.

11 So when youre told that the reason he was not
12 brought to testify is to avoid wasting your time. Just think
13 about the incredible nature of that statement. I have some
14 evidence that is critical, somebody who supposedly played a
15 key role in the events of this case but I'm going to waste
16 your time if I bring that person in, so I'm going to kind of
17 just hope you think that he would have testified good for me.

18 There was no concern about wasting your time
19 questioning Ciara Manning about the lurid, humiliating details
20 of the family court testimony, or at least the alleged family
21 court testimony about -- I don't even want to repeat it -- the
22 disgusting details on evidence that Judge Cogan told you isnt
23 even relevant.

24 Mr. Woo had no compunction about wasting your name
25 asking these questions over and over and over again but the

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1 supervisor he can't bring in? That's a calculated tactical
2 move. There is only one reason that supervisor did not come
3 in to testify and that's because that supervisor could not
4 stand up to cross-examination. He was not going to help
5 Mr. Woo. He would have probably destroyed Mr. Woo's case if
6 there is anything left to destroy.

7 What about the supervisor's notes? Another reason I
8 brought Ms. Durant into court, subpoenaed her, was because I
9 knew she would testify that if the supervisor was involved, he
10 would have notes. Where are the supervisor's notes? Mr. Woo
11 tells you he didnt make the decision, the supervisor did.
12 Ms. Durant told you if the supervisor makes a decision he
13 keeps the notes.

14 Think about why we don't have those notes and now we
15 don't have Mr. Balan, the supervisor, and the fellow case
16 workers who came with Mr. Woo who supported supposedly agreed
17 with his decision. Why weren't they brought in to tell you
18 what they saw? And Mr. Woo kept saying: Well, I didn't
19 really talk to Mr. Southerland that much. I didn't talk to
20 him that much. These other people did all the talking to him.
21 And then his lawyer gets up and asks to you speculate about
22 what they might have said to each other. To speculate, not to
23 decide this case on the evidence and testimony that people
24 here gave and the documents you saw but to imagine testimony
25 between people that weren't even brought in to testify.

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1 And why weren't they? It's remarkable. This case
2 was started in 1999. Mr. Woo was still working at ACS. He
3 worked there for a number of years afterwards. He was a
4 supervisor, he moved up. I think -- and you have the
5 record -- probably to about 2005 maybe even later he worked
6 there.

7 What happens when you get sued and the people who
8 you are working with were witnesses. You talk to them. Hey,
9 I'm getting sued here, how about helping me out? Give me a
10 deposition, come on into court. I want to make sure that you
11 come in and help me out. They're not here. Why aren't they
12 here? Is it really any surprise that he couldnt get one
13 witness out of thief ACS workers who supposedly saw or heard
14 or know about these emergency conditions to come in and
15 bolster his testimony. Not one.

16 Ill tell you why they didnt come in. What indicates
17 worker with a modicum of common sense and self-respect is
18 going to come into court and take an oath and say that, yes, a
19 lamp without a shade and a some extension cords and dirty
20 clothing require child removal without a court order. You
21 can't get anybody to testify to that.

22 Another red herring here was Mr. Southerland's
23 alleged lack of cooperation. Again, Ms. Durant was a useful
24 witness on this issue. I asked her, is it unusual when people
25 are brought into ACS proceedings that they feel put out, that

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1 they're upset, you get angry. Not unusual at all. In fact,
2 its kind of the norm.

3 And you can look at the field manual and it talks
4 about how to deal with this. Its, again, its the norm. Of
5 course, its going to happen its just common sense. So I asked
6 Ms. Durant: Is the fact that somebody said he isnt going to
7 cooperate a week before the inspection mean that during the
8 home inspection you don't offer services or try to get their
9 cooperation. Not at all, you continue. You keep trying to
10 help. You keep trying to help.

11 So when we asked Mr. Woo, well, why didnt you help?
12 All he could say was: Well, Mr. Southerland didnt want my
13 help last week. And that's his excuse for when he's about to
14 take six kids out of the apartment for not saying: Hey, by
15 the way, we can bring you food; we can move this lamp; we can
16 help you with this equipment, we can either rearrange it or
17 put a lock on the door. By the way, we can move these
18 extension cords, I'm a little concerned here. That's his
19 reason for not doing it. He never considered doing it.
20 Again, its made up, its just made up. Its on the spot, its
21 whatever testimony, whatever I got to say in this court.

22 I think the testimony about the supervisor is a red
23 herring, it doesn't excuse whatever happened whether he told
24 her or not. I don't think he did, by the way. I don't think
25 the evidence supports the conclusion that the supervisor

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1 ordered the removal. Well never know because the supervisor
2 didnt come in and testify. But one thing is for sure
3 Judge Cogan will not instruct you that even if the supervisor
4 ordered the removal that that lets Mr. Woo off the hook, it
5 doesn't. Mr. Woo participated, he's got to abide by the
6 Constitutional standards just like anybody else.

7 Now, I want to talk to you for a minute or two about
8 Mr. Woo's notes. Before I get to that, I encourage you to
9 look. I'm not going to spend too much time on it right now.
10 Of the manual, Chapter 6, Page 1 and Page 2, they give a lot
11 of examples of emergency removal situations. They talk about
12 serious physical or emotional injury. Examples of sexual
13 abuse and if the parent refuses or is unable to protect the
14 child. Dangerous environment, substantial likelihood that the
15 child will be harmed and the parent or caretaker refuses to
16 protect the child. Think about that. The allegation here is
17 that it was a dangerous environment as ridiculous as I think
18 that allegation is but that's not enough. The parent has got
19 to refuse to protect the child. And there was no testimony
20 that Mr. Southerland was unwilling to remediate any of these
21 conditions. The only testimony was that I wasnt going to talk
22 to him about that because he was mean to me.

23 He talks about a minimum degree of supervision.
24 "The parent states that he will seriously harm or kill the
25 child." I mean, this is really heavy stuff, that's why

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1 Ms. Durant said this is very rare you doesn't get this too
2 often. Maltreatment. Danger, permanent damage to the body or
3 mind if the child is left in the home. Immediate need of
4 medical or psychiatric care. Evidence suggests the parents
5 are torturing the child.

6 So I encourage you to look at these if you have any
7 lingering doubts about whether something that Mr. Woo cites
8 was about to cause, about to cause harm to these children.
9 And the first pages of the manual, I think its maybe on the
10 first full page. I want to read you this.

11 This is to introduce the subject of Mr. Woo's notes.
12 "We place a high value on due process." You notice those
13 words, due process. "In carrying out our responsibilities in
14 protecting the rights of both children and families."
15 "Carefully documenting the history of a case keeping complete
16 records and honoring the confidentiality requirements are some
17 of the ways this value can be fulfilled in agency practice."
18 And the words that I want to stress there are, "Carefully
19 documenting and keeping complete records."

20 So lets look at Exhibit C-2 which are Mr. Woo's
21 official notes. Paragraph.

22 (The above-referred to exhibit was published in open
23 court.)

24 MR. O'NEILL: So this is the first page. The first
25 entry talks about the case being assigned. And the second

O'NEILL/SUMMATION

1 entry which takes up the whole rest of the page is about his
2 arguments with Mr. Southerland on May 30th.

3 And then, if you go to the second page, and they
4 continue talking about the meeting on May 30th with
5 Mr. Southerland and he talks here about an opportunity to go
6 to the home on June 2nd. Then he skips to June 4th and that's
7 when he met the Southerland children and continues to make
8 some disparaging comments about Mr. Southerland and threatens
9 him with the court action. Then he goes back to 6/3, so he
10 goes back in time. I'm going to talk to you about that in
11 just a second. And then he makes no more efforts to get
12 Mr. Southerland's cooperation, he simply starts filling out
13 court paperwork.

14 So you got barely a page, a little more than a page
15 and a half of notes. Nothing about Ciara. Nothing about
16 meeting Ciara. Nothing about his phone call with the school
17 and I don't know if you noticed this, its not a big point, but
18 its telling. When he was first on the stand and he talked
19 about, I showed him his handwritten notes. He says: All I
20 says I can remember about the conversation with the worker is
21 what I wrote here. And then, later, he had a recovered memory
22 that he remembered talking about the school thought it was a
23 suicide threat or suicide attempt.

24 And then, when I kind of called him on that
25 inconsistency, he was asked by his lawyer, well, how many

O'NEILL/SUMMATION

1 phone conversations did you have with the school counselor?

2 He said: I had a number of them. A number of them.

3 You see how the testimony changes. Depending on the
4 questions that are put it him by his lawyer. Whatever,
5 whatever.

6 So you got this full page here having really dealing
7 with his conflict with Mr. Southerland. And he makes it very
8 plain, Mr. Southerland has caught an attitude. And he says,
9 oh, things like you know I'm not a crackhead and stuff like
10 that.

11 So I think that you can figure out what was
12 important to Mr. Woo by looking at what did he spend the most
13 time in his notes on. What did he write the most about? Not
14 writing about Ciara's problem. He's writing about this
15 personality conflict that he has with Mr. Southerland. I'm
16 not letting Mr. Southerland off the hook on this, but really
17 somebody's got to be a grown up. Mr. Woo is the Government
18 official, he's the one who's got to look out for
19 Mr. Southerland's Constitutional rights. Mr. Southerland
20 doesn't really have to look out for Mr. Woo.

21 So when we're looking for why, why did Mr. Woo act
22 the way he acted, I think its right there in his notes -- he's
23 going to show Mr. Southerland who's boss. Very simple. You
24 met with me, Ill show you what I can do. I'm the Government,
25 doesn't talk to me like that.

O'NEILL/SUMMATION

1 I want to talk to you very briefly about the whole
2 Sonny Southerland/Ciara Manning red herring. As the judge
3 instructed you, not relevant.

4 There is an old adage, and I'm sure you've heard,
5 and I'm embarrassed to repeat it because its so old but it
6 happens to fit. "When you don't have the facts, attack the
7 other side." And that's what you saw just character
8 assassination and that's why Mr. Woo spent so much time on
9 this issue. Hoping that the -- this character assassination
10 would rub off on my clients. My clients who are completely
11 innocent here.

12 My case doesn't require you to believe anything
13 Ciara Manning said, it doesn't require you to believe anything
14 Sonny Southerland said. So whatever you might think about
15 their credibility, it doesn't affect my case. My case is
16 based on the testimony of Mr. Woo, the testimony of
17 Ms. Durant. The notes, the documents that I introduced, the
18 field services manual and the testimony of my client and
19 nobody, nobody has been able to attack the credibility of my
20 clients who were completely innocent, young children when
21 these events occurred.

22 So whatever you find or don't find occurred between
23 Sonny Southerland and Ciara Manning which is not what this
24 case is about you wont be asked any questions about who was
25 telling the truth about family court proceedings.

O'NEILL/SUMMATION

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(Continued on the next page.)

O'NEILL/SUMMATION

1 MR. O'NEILL: Please, don't penalize my children --
2 my clients for this unnecessary and really disturbing side
3 show.

4 I thought it was curious, I never heard Mr. Woo
5 express any concern for these children. I never heard this
6 man say, "I felt bad for them. They're really in a tough
7 situation. I didn't think that they should live the way they
8 were living. These children needed help." I didn't hear any
9 of that. I didn't hear any of that at all, which I thought
10 was really remarkable if you're really trying to save kids.

11 I give a lot of credit to case workers who do their
12 job. There are kids who need help. And it's got to be
13 heartbreaking and common sense tells you that if you deal with
14 a heartbreaking case, you're going to need to hold that.
15 You're going to need to talk about that. I didn't hear
16 anything from Mr. Woo expressing that he was -- that these
17 kids needed help and that he was concerned about them.

18 I heard a remarkable statement that my clients
19 suffered no damages, and yet about a half-hour later, I heard
20 that that pain of removal is a given. Well, I certainly agree
21 with the second statement that counsel made.

22 Now, I want to talk to you about damages. We have a
23 real flaw in our system, as much as I admire our system and
24 think it's probably the best judicial system in the world.
25 All that it can do is award money damages. It can't roll back

O'NEILL/SUMMATION

1 time. We can't go back to 1997 and put these kids back into
2 that home and let them live those days that were taken away
3 from them. We can't force Mr. Woo to apologize. It's a civil
4 case. We can't put Mr. Woo in jail. The only remedy that you
5 can do for my clients is to give them money.

6 And it's discomfoting for me to talk in a case like
7 this, where the damages that were suffered were not to
8 anybody's pocket book, they were to the heart and soul of
9 young children, and to talk about money as a substitute --
10 it's not. And please don't hold it against me that I
11 addressed this. It's my obligation to represent my clients,
12 and to make the argument for them, because that's what the
13 system is.

14 So before we talk about that, I want to just go
15 through what happened, and talk about how I see the damages
16 based on the testimony that we have, and what I'd like you to
17 do is, you know, you're looking at adults here now. But
18 imagine them three to nine years old. And picture yourself
19 next to them. They're sleeping in their beds. They're
20 awoken. There are sounds of -- some noise in the house. At
21 first, children are a little groggy. They start to realize it
22 sounds like arguments, voices that nobody recognizes. They
23 can tell that their father's having an argument with somebody.
24 There are strangers in the house.

25 Eventually, people come into the room, tell them to

O'NEILL/SUMMATION

1 get out of bed. Get dressed. "What's going on?" "Just get
2 dressed." And you look out in the hall and you see police
3 officers and you see other strangers and you see your father
4 arguing with police officers, and you're scared because you
5 know the police officers, when you argue with police officers,
6 you're in trouble. And your little heart is beating and
7 you're afraid for your dad. You know, as kids, your parents
8 are everything. Your survival depends on them. So when you
9 see your parents threatened, you are threatened.

10 And eventually, you come to realize that these
11 strangers are going to take you away from your dad. And you
12 you're crying and your siblings are crying. And your dad is
13 trying to comfort you, but can't be comforted because you're
14 being taken out of the home. "And daddy, where are they
15 taking us? What's going on?" "You'll be okay." He tries to
16 calm you down with an Icee. "It's a big mistake. I'm going
17 to help you out. I'm going to take care of you."

18 And you walk out into the hallway of your building
19 and you turn around. And you see that door close and your
20 dad's on the other side and now he's out of view, and you're
21 completely alone with these strangers. Just imagine the fear,
22 the pain, suffering.

23 And you're taken down to a car and they're driven
24 somewhere and they're taken to a shelter, put in this big room
25 with a bunch of other kids, more strangers, on cots and it's

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1 dark. And the next day, some of the children are moved
2 somewhere else. So the ones who were removed, they're going
3 somewhere new and they're facing new strangers, new fears, new
4 worries, new wonders -- "And where's dad? Where's dad? We
5 never been away from dad before."

6 And some are left in the shelter. You heard how
7 Sonny was the last one there. The siblings are broken up.
8 They lose the comfort of each other. So young. I don't know
9 how to -- I can't even a imagine this happening to a child.
10 It's just -- it's unthinkable.

11 And for all of this, the most valuable thing lost
12 during this period of separation is the love of the parent.
13 And for children who loves is a very tangible thing, love is
14 the most important thing for the children. Children need love
15 more than anything else in the world. They need the love of
16 their parent because nobody loves a child like a parent.

17 No Family Court judge, no case worker, no shelter
18 worker, no foster care, no foster person is going to love a
19 child the way that his or her parent does.

20 The power of a parent's love -- there's a story
21 about a man who goes to talk to his Rabbi. He says, "I'm
22 concerned about my son. He's going down the wrong path. He's
23 not behaving the way I want him to." The Rabbi says, "Love
24 him more."

25 When I think of a parent's love, I think of this --

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1 and you've probably heard it before, but I want to read it to
2 you: "Love is patient and kind. Love does not envy or boost.
3 It is not arrogant or rude. It does not insist on its own
4 way. It is not irritable or resentful. It does not rejoice
5 at wrongdoing, but rejoices with the truth. Love bears all
6 things, believes all things, hopes all things and endures all
7 things. Love never ends."

8 That's what was taken away. And so, what can we do
9 about that? Here's how I think about it. Assume you're
10 sitting in a case and the case is about a child who was
11 kidnapped, and the kidnapper is found after four days. The
12 child is recovered. No physical harm to the child. The child
13 is reunited with the parent after four days.

14 And now, the kidnapper is facing legal redress. Is
15 there any doubt in your mind that the child should be awarded
16 a substantial sum of money, a million dollars, two million
17 dollars, for enduring this kidnapping? Well, you might say,
18 well, this isn't really a kidnapping. But when a government
19 worker removes children from his parent without a Court Order
20 illegally, it is a kidnapping.

21 In fact, it's worse -- it's worse because if you're
22 subject to a kidnapping, you call the police and if the police
23 get there on time, they're going to arrest the kidnapper. But
24 in this case, the police can't help you because the person
25 taking your children has got the color of law. He's a

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1 government official. And the policeman says, "I can't help
2 you." At least in a real kidnapping, you know who's the good
3 guy and who's the bad guy. A government official who abuses
4 his power is especially insidious, capable of doing just as
5 much or more harm than any criminal.

6 I believe an award of punitive damages is called for
7 here, and the purpose is not just to punish the wrongdoer, but
8 is to send a message. So what's the message? This is the
9 message, the Constitution of the United States of America.
10 This is what makes the United States the best country on
11 earth. This is what makes the United States different and
12 unique.

13 But it's just a piece of paper. I'll put this on my
14 door. It's not going to stop anybody from coming in. It
15 won't keep the government out of your house unless it's given
16 life. You ladies and gentlemen -- you give life to the
17 Constitution. You are the voice of this community. You and
18 only you are in a position to say that government officials
19 cannot lie their way into a private home. You and only you
20 are in a position to say that government officials can't take
21 children out of their homes for bogus nonemergency reasons
22 without a Court Order.

23 When this trial is over and you'll go back to your
24 daily lives, and you'll be talking to your friends and your
25 coworkers and you're going to talk about this case, as you

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1 will be permitted to do. You're going to want to be able to
2 tell people, look them in the eye and say, "I gave a true and
3 just verdict. I upheld the Constitution not just for
4 Southerlands, but for the entire community, for New York, for
5 the United States of America."

6 You want to give a verdict that will make people sit
7 up and take notice. Give a verdict that will get reported in
8 the newspaper, so that far and wide, people know that a jury
9 sitting in a federal court in Brooklyn will uphold the
10 Constitution and woe be to any government official who tries
11 to abuse his power in the future. It won't be tolerated.

12 I was appointed to represent the Southerland
13 children in 2001. I've worked with them now for 12, going on
14 13 years. I am immensely proud to represent them. And so now
15 my job is almost over here. And I give them to you. And I
16 appreciate all of your attention and thank you. God bless
17 you.

18 THE COURT: Thank you, Mr. O'Neill.

19 Ladies and gentlemen, you have a have choice. The
20 charge I'm going to give you, the instruction, will take about
21 25 to 30 minutes for me to give you. There's a lunch waiting
22 for you now in the jury room. If you want, we can break for
23 just a short lunch, like half an hour, and you can just get
24 something to eat, and then we'll come back. I'll give you the
25 charge.

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1 If you do that, as tempting as it may be, I must
2 specifically admonish you not to talk about the case until you
3 have had my charge, or I can go ahead right now and give the
4 charge and then you can have lunch. What's your preference?
5 Who's hungry?

6 (Jurors confer.)

7 THE COURT: All those in favor of having lunch right
8 now, raise your hand.

9 (Jurors comply.)

10 THE COURT: Okay. That's enough to do that.

11 So we will break until five to two. Please, please,
12 do not discuss the case at all, as tempting as it may be.
13 I'll see you at five to two. Have a nice lunch.

14 (Jury exits.)

15 THE COURT: All right. Recess 'til 1:55.

16 (Lunch recess.)

17 (Continued on the next page.)

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19
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21 AFTERNOON SESSION

22 COURTROOM DEPUTY: All rise.

23 THE COURT: All right. Lets have the jury, please.

24 COURTROOM DEPUTY: Jury entering.

25 (Jury enters courtroom at 2: 03 p.m.)

O'NEILL/SUMMATION

1 THE COURT: Everyone be seated.

2 Ladies and gentlemen of the jury, now that the
3 evidence in this case has been presented and the attorneys for
4 the plaintiffs and the defendant have concluded their closing
5 arguments, it is my job to instruct you on the law that will
6 govern this case. My instructions will going to be in three
7 parts.

8 First, Ill instruct you on the general rules that
9 govern your duties as jurors in a civil case.

10 That's the longest part of these instructions.

11 Second, Ill instruct you on the legal elements of
12 the plaintiff's claims.

13 And third Ill give you you some important principles
14 that you will use in your deliberations.

15 Now, its very important that you listen carefully
16 and concentrate on these instructions. I ask you again for
17 your patience, cooperation, and attention. However, I'm going
18 to give you have a copy of these instructions so you'll have
19 them during your deliberations. Therefore, it shouldn't be
20 necessary for you to take notes, although you certainly can if
21 you want to.

22 Youre about to enter your final duty which is to
23 decide the fact issues in this case. Its been very obvious to
24 me, and I'm sure, to counsel, that you have faithfully
25 discharged your duty to listen carefully and observe each

JURY CHARGE

1 witness who testified. Its clear that you followed the
2 testimony with close attention. I ask that you now give me
3 that same careful attention that you gave at trial as I
4 instruct you on the law.

5 Its your duty to accept the instructions of law that
6 I'm about to give you and apply them to the facts as you
7 determine them, just as it has been my duty to preside over
8 the trial and decide what testimony and evidence is relevant
9 under the law for your consideration.

10 On these legal matters, you have to take the law as
11 I give it to you. If any attorney has stated a legal
12 principle different from any that I state to you in these
13 instructions, its my instructions that you have to follow.

14 Don't single out any one instruction alone as
15 stating the law. You have to consider these instructions as a
16 whole when you retire to deliberate in the jury room.

17 You also must not be concerned about the wisdom of
18 any rule that I state. Regardless of any continue that you
19 may have as to what the law may be or what it should be, it
20 would violate your sworn duty to base a verdict upon any other
21 view of the law than that which I'm about to give you.

22 As members of the jury, you are the sole and
23 exclusive judges of the facts. You could be wearing black
24 robes for the job youre about to do. You pass on the
25 evidence. You determine the credibility of the witnesses.

JURY CHARGE

1 You resolve such conflicts as there may be in the testimony.
2 You draw whatever reasonable inferences you decide to draw
3 from the facts as you have determined them and you determine
4 the weight of the evidence. In determining these issues, no
5 one can invade your province or functions as jurors.

6 In order for you to determine the facts, you have to
7 rely on your own recollection of the evidence. What the
8 lawyers have said in their opening statements, in their
9 closing arguments, in their objections or in their questions
10 is not evidence. You also may not consider any answer to a
11 question that I directed you to disregard or that I directed
12 should be struck from the record.

13 Now, I've seen that some of you have taken notes
14 during trial. Those notes are to serve merely as an aid to
15 your memory and should not take precedence over your
16 independent recollection of what happened at trial. In
17 addition, the notes of one juror should not take precedence
18 over the notes or independent recollection of another juror
19 during the course of your deliberations. As I told you at the
20 beginning of trial, there's been a court reporter present
21 throughout the proceedings to make a verbatim transcript. You
22 may refer to your own notes to attempt to refresh your
23 recollection of the testimony, but if you're in doubt about
24 some portions of the testimony you can request that the
25 official trial transcript be read back to you.

JURY CHARGE

1 Now, during the trial, I have not expressed, nor
2 have I intended to intimate any opinion as to which witnesses
3 are or are not worthy of belief, what facts are or are not
4 established, or what inference or inferences should be drawn
5 from the evidence. If any expression of mine has seemed to
6 indicate an opinion relating to any of these matters I
7 instruct you to disregard it. You are, I repeat, the
8 exclusive judges of all the questions of fact submitted to you
9 and of the credibility of the witnesses.

10 Now, from time to time, I was called upon to pass
11 upon the admissibility of certain evidence. I tried to do so
12 as much as I could out of your hearing. You must have no
13 concern with the reasons for any such rulings and you are not
14 to draw any inferences from them. Whether offered evidence is
15 admissible is purely a question of law in my province to
16 decide and outside the province of the jury. You have to
17 refrain from speculation or guesswork or conjecture about the
18 nature or effect of any discussion that counsel and I had
19 outside of your hearing or sight.

20 Now, its the duty of the attorneys to object when
21 their adversary offers testimony or other evidence that the
22 attorney believes is not properly admissible. Its my job to
23 rule on those objections. Therefore, why an objection was
24 made or how I ruled on it is not your concern. You can't draw
25 any inference from the fact that an attorney objected to some

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1 evidence. Nor should you draw any he inference from the fact
2 that I either sustained or overruled any objection.

3 The personalities and conduct of counsel in the
4 courtroom are not in any way in issue. If you formed any
5 reactions of any kind to the lawyers in the case, favorable or
6 unfavorable, whether you approved or disapproved of their
7 behavior as advocates those reactions should not enter into
8 your deliberations.

9 Attorneys also have the right and the duty to ask me
10 to make rulings of law and to request conferences at the side
11 bar out of your hearing. All those questions of law have to
12 be decided by me. You should not show any prejudice against
13 any attorney or their client because that attorney objected to
14 the admissibility of evidence, or asked for a side bar out of
15 your hearing, or asked me to make a ruling on a point of law.

16 In carrying out your duty, please remember that you
17 took an oath to render judgment impartially and fairly,
18 without prejudice or sympathy and without fear, solely upon
19 the evidence in the case and the applicable law. I know that
20 you will do this to reach a just and true verdict.

21 Let me also instruct you that there are some things
22 that you may have not consider in your deliberations. Your
23 verdict has to be based solely upon the evidence or lack of
24 evidence developed at this trial.

25 It would, therefore, be improper for you to consider

JURY CHARGE

1 any personal feelings you may have about any parties' race,
2 religion, national origin, sex, or age.

3 It would be equally improper for you to allow any
4 feelings you have or you might have about the nature of the
5 claims or defenses to influence you in any way.

6 The parties in this case are entitled to a trial
7 that's free from prejudice. Our judicial system can't work
8 unless you reach your verdict through a fair and impartial
9 consideration of the evidence.

10 Now, under your oath as jurors, you're also not to be
11 swayed by sympathy or bias towards any party; nor what the
12 reaction of the parties or the public to your verdict may be;
13 nor whether it will please or displease anyone or be popular
14 or unpopular or indeed by any consideration outside the case
15 as it has been presented to you in this courtroom. You should
16 consider only the evidence, find the facts from what you
17 consider to be the believable evidence and apply the law as I
18 now give it to you. Your verdict will be determined by the
19 conclusion you reach no matter who the verdict helps or hurts.

20 Let me go over with you the types of evidence that
21 you can consider. In determining the facts, as I said, it's
22 your own recollection of the evidence that controls. The
23 evidence which you're going to decide the facts from came in in
24 two forms: First, the sworn testimony of witnesses, both on
25 direct and cross-examination. Second, exhibits that have been

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1 received by me in evidence.

2 I'll explain more about each of these, but first let
3 me tell you about certain things that are not evidence and
4 must be disregarded by you in determining what the facts are.

5 As I said before, arguments, questions, objections
6 or statements by the lawyers are not evidence. Anything I may
7 have said or done is not evidence. Anything you may have heard
8 outside of the courtroom, despite your best efforts to stay
9 away from anything about the case, that's also not evidence.

10 Furthermore, when I sustained an objection or
11 ordered that any answer be stricken you must disregard that
12 answer in its entirety. And when I instructed you that
13 evidence is received for a limited purpose, you must consider
14 it for that purpose only. This relates to certain testimony
15 and documents concerning some of the family court proceedings.
16 And I told you consideration of that evidence is limited to
17 the issue of damages and determining the credibility of
18 Mr. Southerland senior and Ms. Ciara Manning and it must not
19 be used by you for any other purpose.

20 There's two kinds of evidence that you can properly
21 use.

22 One type of evidence is called direct evidence.
23 Direct evidence is a witness' testimony or the contents of a
24 document about what the witness saw, heard, or observed. In
25 other words, when a witness testifies about what is known by

JURY CHARGE

1 virtue of the witness's own senses -- what the witness sees,
2 feels, touches, or hears that's called direct evidence.

3 Circumstantial evidence is evidence that tends to
4 prove a fact by other facts. There's a simple example we use
5 in this courthouse to illustrate the difference between direct
6 and circumstantial evidence.

7 Lets suppose you are outside and you see rain drops
8 coming down. You have credible evidence that its raining, you
9 see it with your own eyes. That's direct evidence. Lets next
10 suppose youre sitting in this courtroom and there's no windows
11 in the courtroom so you can't see what's going on outside. If
12 somebody comes in wearing a dripping wet raincoat and with a
13 dripping wet umbrella you could infer from that that its
14 raining outside. On the other hand, if somebody comes in
15 carrying a perfectly dry umbrella and raincoat you could infer
16 that its not raining outside.

17 That's all there is to circumstantial evidence. You
18 infer on the basis of reason and experience and common sense
19 from an established fact such as the wet raincoat and dripping
20 umbrella, or the lack of an established fact such as the lack
21 of a wet raincoat and dripping umbrella the existence or
22 nonexistence of some other fact whether its raining outside or
23 not. The law doesn't make any distinction between direct and
24 circumstantial evidence. You could consider both in reaching
25 your verdict.

JURY CHARGE

1 Now, you've heard me use the term "inference," and
2 in the lawyers' arguments they asked you to infer on the basis
3 of your reason, experience, and common sense, from one or more
4 established facts, the existence of some other fact. Its for
5 you and you alone to decide what inferences youre going to
6 draw.

7 An inference is not a suspicion or a guess. Its a
8 reasoned, logical decision to conclude that a fact exists on
9 the basis of nor fact that you know exists. Its a deduction
10 or conclusion that you are permitted but not required to draw
11 from the facts that have been proven by direct or
12 circumstantial evidence.

13 Now, in addition to the sworn testimony of
14 witnesses, the evidence in the case includes exhibits that I
15 have received in evidence. You heard me say "received" a
16 numbers of times when the parties were using documents.

17 You may only consider exhibits that I have admitted
18 into evidence. Exhibits that have been market for
19 identification but have not been received in evidence may not
20 be considered by you.

21 Keep in mind that the law does not require any party
22 to call as witnesses all persons who may have been present at
23 any time or place involved in the case, or who may appear to
24 have some knowledge of the matters at issue in this trial.
25 Nor does the law require any party to produce as exhibits all

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1 papers or other items mentioned during the course of the
2 trial.

3 Now, let me talk to you a bit about witness
4 credibility.

5 You had an opportunity to observe all of the
6 witnesses. Its now your job to decide how believable each
7 witness was in their testimony. As jurors, you are the sole
8 judges of credibility. You have to assess the credibility of
9 each witness and of the importance of their testimony.

10 The law does not require you to accept all the
11 evidence that I admit. In deciding what evidence you are
12 going to accept, you have to make your own evaluation of the
13 testimony given by each of the witnesses and decide how much
14 weight you choose to give it that testimony. As I mentioned
15 when we started the trial, there is no magical formula by
16 which youre going to evaluate testimony. You bring with you
17 to this courtroom all of the experience and the background of
18 your lives. In your everyday affairs, you decide for
19 yourselves the reliability or unreliability of things that
20 people tell you. The same tests that you use in your everyday
21 dealings apply in your deliberations. The interest or lack of
22 interest of any witness in the outcome of this case; the bias
23 or prejudice of a witness if there is any; the manner in which
24 the witness gives testimony on the stand; the opportunity that
25 the witness had to observe the facts about which the witness

JURY CHARGE

1 testifies; and the probability or improbability of the
2 witness's testimony when considered in light of all the other
3 evidence in the case. These are all items to be considered by
4 new deciding how much weight, if any, youre going to give it a
5 witness's testimony.

6 If it appears that there is a discrepancy in the
7 evidence, you'll have to consider whether the apparent
8 discrepancy can be reconciled by fitting the two stories
9 together. If that's not possible, you have to decide which of
10 the conflicting stories you will accept.

11 Now, if you find that any witness has willfully
12 testified falsely as to any material fact -- that is, as to an
13 important matter -- the law permits you to disregard the
14 entire testimony of that witness upon the principle that
15 somebody who testifies falsely about one material fact is
16 likely to testify falsely about everything. However, youre
17 not required to consider such a witness as totally
18 "unbelievable." You can accept so much of the witness's
19 testimony as you deem true and disregard the part that you
20 feel is false. By the process that I've just described to
21 you, you as the sole judges of the facts, decide which of the
22 witnesses you will believe, what portion of their testimony
23 you accept, and what weight youre going to give to it.

24 Now, you heard me say that the plaintiffs have to
25 prove their case by a preponderance of the evidence. And the

JURY CHARGE

1 question naturally is, "What is a preponderance of the
2 evidence mean?" To establish a fact by a preponderance of the
3 evidence means that somebody has to prove that something is
4 more likely true than not true. In other words, a
5 preponderance of the evidence means such evidence that when
6 considered and compared with the other evidence opposed to it
7 has more convincing force and produces in your mind a belief
8 that what is sought to be proved is more likely so than not
9 so. A preponderance of the evidence means the greater weight
10 of the evidence. It refers to the quality and persuasiveness
11 of the evidence, not the number of witnesses or documents
12 produced by either party. In determining whether a claim has
13 been proven by a preponderance of the evidence you can
14 consider the relevant testimony of all witnesses regardless of
15 who may have called them and all of the relevant exhibits
16 received in evidence regardless of who may have produced them.

17 The burden of proof rests on plaintiffs. That means
18 that in order for plaintiffs to prevail, the evidence that
19 supports their claim must appeal to you as more nearly
20 representing the truth than the evidence opposed to their
21 claim. If it doesn't, or if it weighs so evenly that you're
22 unable to say that there is a preponderance on either side,
23 then you have to decide the question in favor of the
24 defendant. Its only if the evidence favoring plaintiff's
25 claims outweighs the evidence opposed to them that you can

JURY CHARGE

1 find in favor of plaintiffs.

2 Now, let me go over the legal elements plaintiffs'
3 claims.

4 The law to be applied to plaintiff's claims is the
5 Federal Civil Rights Law, Section 1983 of Title 42 of the
6 United States Code. That section provides a remedy for
7 individuals who allege they have been deprived of their
8 Constitutional rights by persons acting under color of state
9 what you.

10 To prove a Section 1983 claim against the defendant,
11 the burden is on plaintiffs to establish a preponderance of
12 the evidence that:

13 One, the conduct complained of was committed by
14 persons acting under color of state law;

15 Two, that this conduct deprived plaintiffs of
16 rights, privileges, or immunities secured by the Constitution
17 or laws of the United States; and,

18 Three, that defendant's contacts were the proximate
19 cause of any injuries and consequent damages sustained by
20 plaintiffs.

21 (Continued on the next page.)
22
23
24
25

JURY CHARGE

1 THE COURT: Now, let me explain each of these in a
2 little bit more detail.

3 The first element of plaintiff's claim is that the
4 defendant acted under color of state law. The phrase "under
5 color of state law" is a shorthand reference to words in
6 Section 1983, which includes within its scope action taken
7 under color of any statute, ordinance, regulation, custom or
8 usage of any state. The term "state" encompasses any
9 political subdivision of a state, such as a county or a city,
10 and also state agencies or county or city agencies. In this
11 case, plaintiffs and defendant have agreed that defendant
12 acted under color of state law. In other words, the first
13 element of plaintiffs' claims is met.

14 The second element of plaintiffs' claims is that
15 they were deprived of their Constitutional rights by
16 defendant. There are two Constitutional amendments at issue
17 in this case. First, under the Fourth Amendment to the
18 Constitution, citizens have the right to not be subjected to
19 an unreasonable search or an unreasonable seizure. A seizure
20 would include the removal of children from the custody of
21 their parents. Second, under the 14th Amendment, citizens
22 have the right not to have their liberty interfered with,
23 without due process of law. The right of a parent to raise
24 children and the right of children to be raised by their
25 parents are liberty interests protected by the 14th Amendment.

JURY CHARGE

1 Due process of law means following proper legal procedures.

2 To prove a violation of their Constitutional rights,
3 plaintiffs don't need to prove that defendants had the
4 specific intent to deprive plaintiffs of their Constitutional
5 rights. Plaintiffs need only prove that defendant's acts
6 themselves were knowing and intentional or reckless. An act
7 is intentional if it's done voluntarily or deliberately and
8 not because of mistake, accident, negligence or other innocent
9 reason. An act is reckless if it's done in conscious
10 disregard of its known probable consequences. In other words,
11 plaintiffs must prove that defendant participated in the
12 removal of the children knowingly or voluntarily and
13 deliberately or recklessly.

14 In addition, plaintiffs must prove that those
15 intentional or reckless acts committed by defendant caused
16 plaintiffs to suffer the loss of Constitutional rights. Now
17 as I said a minute ago, plaintiffs in this case alleged that
18 defendant violated three different kinds of rights: Their
19 right to be free from an unreasonable search and an
20 unreasonable seizure, both of those under the Fourth
21 Amendment, and their right not to be deprived of their liberty
22 interests without due process of law, under the 14th
23 Amendment. I'll explain each of those now.

24 To prevail on the unreasonable search claim under
25 the Fourth Amendment, plaintiffs must prove that defendant

JURY CHARGE

1 knowingly and intentionally or with reckless disregard for the
2 truth provided false information to the Kings County Family
3 Court to obtain the Order of Entry to the Southerland
4 apartment, and it was the falsity of the information that
5 resulted in the Family Court's issuance of that order. If you
6 find that plaintiffs have not proven this, then your inquiry
7 stops there and you'll find for defendant on plaintiffs'
8 unreasonable search claim. If, however, you find that the
9 plaintiffs have met their burden, then you'll proceed to
10 determine whether and to what extent defendant's actions
11 approximately caused plaintiffs to sustain damages.

12 The next claim is the plaintiff children's Fourth
13 Amendment unreasonable seizure claim. Because the removal or
14 seizure of the children occurred without a court removal
15 order, there's a presumption that the removal was
16 unreasonable. Plaintiffs may rely on that presumption to
17 satisfy their burden of proof.

18 The presumption that the removal was unreasonable
19 may be defeated, however, if defendant demonstrates that there
20 were emergency circumstances that justified removal of the
21 children. Therefore, to prevail on the unreasonable seizure
22 claim, the plaintiff children must prove that there were no
23 emergency circumstances that justified removal of the
24 children. In other words, the plaintiff children must prove
25 that they were not in imminent -- in danger of imminent harm

JURY CHARGE

1 at the time they were removed from the home.

2 If you find that the plaintiff children have not
3 proven this, then your inquiry stops there and you'll find for
4 defendant on the plaintiff children's unreasonable seizure
5 claim. If, however, you find that the plaintiff children have
6 met their burden as set forth above, you must also determine
7 whether defendant participated in the removal knowingly and
8 intentionally or recklessly, as I instructed you earlier.

9 If you find that the plaintiff children have not
10 proven this, then your inquiry will stop there and you'll find
11 for defendant on that claim. If, however, you find that the
12 plaintiff children have proven that emergency circumstances
13 did not exist at the time of removal and defendant's
14 participation in the removal was knowing, intentional or
15 reckless, then you'll proceed to determine whether and to what
16 extent defendant's actions proximately caused the plaintiff
17 children to sustain damages.

18 The final claim, third claim, is that the defendant
19 violated the plaintiffs' rights to due process of law when the
20 children were removed from the home without a court removal
21 order. The claim is evaluated similarly to the unreasonable
22 seizure claim that I just explained to you. Because the
23 removal or seizure of the children occurred without a court
24 order, that is a court removal order, there is again a
25 presumption that the removal violated plaintiffs' right to due

JURY CHARGE

1 process of law. Plaintiffs may again rely on that presumption
2 to satisfy their burden of proof.

3 The presumption that the removal violated
4 plaintiffs' due process rights may be defeated, however, if
5 defendant demonstrates that there were emergency circumstances
6 that justified removal of the children. Therefore, to prevail
7 on their due process claim, plaintiffs must prove that there
8 were no emergency circumstances that justified removal of the
9 children. As I've already instructed you, this means that
10 plaintiffs must prove that they were not in danger of imminent
11 harm at the time they were removed in the home.

12 In you find that plaintiffs have not proven this,
13 then your inquiry stops there and you'll find for defendant on
14 plaintiffs' due process claims. If, however you find that
15 plaintiffs have met their burden as set forth above, you must
16 also determine whether defendant participated in the removal
17 knowingly, intentionally or recklessly, as I instructed you a
18 minute ago.

19 If you find that the plaintiffs have not proven
20 this, then your inquiry stops there and you'll find for the
21 defendant on this claim. If, however, you find that
22 plaintiffs have proven that emergency circumstances did not
23 exist at the time of removal and defendants participation in
24 the removal was knowing and intentional or reckless, then
25 you'll proceed to determine whether and to what extent

JURY CHARGE

1 defendant's actions proximately caused plaintiffs to sustain
2 damage.

3 Now, you have heard me use the term "proximate
4 cause" a number of times. That's the third element that the
5 plaintiffs have to prove, that defendant's acts were a
6 proximate cause of any injuries sustained by plaintiffs.
7 Proximate cause means there must be a sufficient causal
8 connection between the act or omission of the defendant and
9 any injury or damage sustained by plaintiffs.

10 An act or omission is a proximate cause of an injury
11 if it was a substantial factor in bringing about or actually
12 causing injury. That is, if the injury was a reasonably
13 foreseeable consequence of defendant's act or omission. If an
14 injury was a direct result or a reasonably probable
15 consequence of defendant's act or omission, then it was
16 proximately caused by that act or omission. In other words,
17 if the defendant's acts or omissions had such an effect in
18 producing the injury that a reasonable person would regard it
19 as being a cause of the injury, then the act or omission is a
20 proximate cause. Keep in mind that there may be more than one
21 proximate cause of an injury or damage.

22 In order to prove damages for any injury, plaintiffs
23 must prove that such injury would not have occurred but for
24 the conduct of the defendant. If you find that plaintiffs'
25 injury would have occurred even in the absence of defendant's

JURY CHARGE

1 conduct, you must find that defendant did not proximately
2 cause plaintiffs' injury.

3 I'm now going to instruct you on the law of damages.
4 The fact that I'm instructing you on the law of damages does
5 not mean that I have any opinion as to whether or not
6 plaintiffs have proven any or all of their claims. I have no
7 such opinion. I only get one opportunity to instruct you, so
8 I'm instructing you on the law of damages in case your
9 deliberations reach that issue.

10 If you find that plaintiffs have proven their claims
11 by a preponderance of the evidence, then you must award them a
12 sum of money that you believe will fairly and justly
13 compensate them for the deprivation of their rights. And as
14 I'm about to explain, such an award of damages will either be
15 a reasonable amount that can exceed one dollar, and those are
16 called compensatory damages, or an amount that cannot be
17 greater than one dollar, and those are called nominal damages.
18 You may only award plaintiffs damages if they have proven
19 liability according to the standards that I just explained to
20 you.

21 Plaintiffs are entitled to compensatory damages for
22 those injuries that you find they have proven. You cannot,
23 however, simply award plaintiffs damages for any injury they
24 suffer. You can only award compensatory damages for those
25 injuries that are a direct result of actions by a defendant

JURY CHARGE

1 whom you have found is liable to plaintiffs. The damages that
2 you award must be fair compensation, no more and no less.
3 Compensatory damages can't be based on speculation or
4 sympathy. Rather, they must be based on the evidence
5 presented at trial and only on that evidence.

6 In determining the amount of any damages that you
7 decide to award, you have to be guided by common sense.
8 Computing damages may be difficult, but you must not let that
9 difficulty lead to you engage in arbitrary guesswork. You
10 must use sound discretion in fixing an award of damages,
11 drawing reasonable inferences from the facts in evidence. On
12 the other hand, the law does not require that plaintiffs prove
13 the amount of their damages with mathematical precision, but
14 only with as much definiteness and accuracy as circumstances
15 permit.

16 If you determine that the plaintiffs are entitled to
17 compensatory damages, you will then need to determine over
18 what period of time to compute those damages.

19 Here, the parties agree that at some point in time,
20 the Family Court determined that the plaintiff children should
21 not be returned to the custody of their father. The date on
22 which the Family Court made that order is disputed, and you'll
23 need to determine that date. Once you do, I instruct you that
24 plaintiffs may not recover damages for any injury occurred,
25 including damages for their continued separation after the

JURY CHARGE

1 date that the Family Court determined that the plaintiff
2 children should not be returned to their father. However, to
3 the extent that plaintiffs incurred any emotional injury that
4 was proximately caused by defendant's acts or omissions prior
5 to the date of that Family Court order and that emotional
6 injury continued beyond the date of the Family Court order,
7 you may award damages for that emotional injury.

8 Now let me tell you about nominal damages. The mere
9 fact that a person has been deprived of a Constitutional right
10 is an injury to that person, whether or not the person can
11 prove compensatory damages. Therefore, if you find that any
12 of the plaintiffs were deprived of a Constitutional right by
13 defendant, but that they failed to prove compensatory damages
14 for their claim, you should award that plaintiff nominal
15 damages in a sum not to exceed one dollar.

16 In addition to compensatory or nominal damages, you
17 may consider awarding plaintiffs punitive damages. If you
18 return a verdict for plaintiffs on any of their claims, you
19 may award punitive damages. An award of punitive damages is
20 discretionary, that is, if you find that the legal
21 requirements for punitive damages are satisfied, then you may
22 decide to award punitive damages or you may decide not to
23 award them. You may award plaintiffs punitive damages even if
24 you determine that they have not proven compensatory damages.

25 Punitive damages are awarded to punish defendant or

JURY CHARGE

1 to deter defendant and others like defendant from committing
2 such conduct in the future. You may only award punitive
3 damages if you find that any of the acts committed by
4 defendant were done maliciously or wantonly.

5 Defendant acted maliciously if his actions were
6 prompted by ill will or spite towards plaintiffs. Defendant's
7 actions were wonton if he acted in a reckless or callous
8 disregard of or indifference to plaintiffs' rights.
9 Plaintiffs have the burden of proving that defendant acted
10 maliciously or wantonly.

11 In making this decision, you should consider the
12 underlying purpose of punitive damages. Thus, in deciding
13 whether to award punitive damages, you should consider whether
14 a defendant may be adequately punished by an award of
15 compensatory or nominal damages only or whether his conduct
16 was so extreme and outrageous that those damages are
17 inadequate to punish the wrongful conduct.

18 You should also consider whether compensatory or
19 nominal damages, standing alone, are likely to deter or
20 prevent defendant from similar wrongful conduct in the future
21 or whether punitive damages are necessary to provide
22 deterrence. Finally, you should consider whether punitive
23 damages are likely to deter or prevent other persons from
24 performing wrongful acts similar to those defendant may have
25 committed.

JURY CHARGE

1 If you decide to award punitive damages, these same
2 purposes should be kept in mind as you determine the
3 appropriate sum of money to be awarded as punitive damages.
4 The amount of punitive damages that you award should be
5 proportionate to the need to punish and deter.

6 Now, I'll move on to the final section, which is
7 just a few general remarks about how you're going to go about
8 deliberating.

9 Your function to reach a fair conclusion from the
10 law and the evidence is a vital one. Your verdict has to be
11 unanimous, that is, all of you must ultimately reach the same
12 conclusion.

13 Each juror is entitled to their opinion. You
14 should, however, exchange views with your fellow jurors.
15 That's the very purpose of jury deliberation: To discuss and
16 consider the evidence, to listen to the arguments of fellow
17 jurors, to present your individual views, to consult with one
18 another and to reach an agreement based solely and wholly on
19 the evidence, if you can do so without violence to your own
20 individual judgment.

21 Each of you has to decide the case for yourself,
22 after consideration of the evidence in the case with your
23 fellow jurors. You should not hesitate to change an opinion
24 that after discussion with your fellow jurors appears to have
25 been erroneous; however, if after carefully considering all of

JURY CHARGE

1 the evidence and the arguments of your fellow jurors, you
2 still entertain a conscientious view that differs from the
3 others, you are not to yield your conviction simply because
4 you're outnumbered. Your final vote must reflect your
5 conscientious conviction as to how the issues should be
6 decided.

7 During your deliberations, you must not communicate
8 with or provide any information to anyone by any means about
9 this case. I've been instructing you throughout the trial on
10 how you can't use any electronic devices, smartphones,
11 Blackberries, iPads, text messaging, instant messaging or any
12 internet or social media websites, such as Facebook, MySpace,
13 LinkedIn, YouTube or Twitter to communicate to anyone
14 information about this case or to conduct any research about
15 this case until I've accepted your verdict.

16 You cannot consult dictionaries or reference
17 materials or use any other electronic tool to obtain
18 information about the case or to help you decide the case. Do
19 not try to find information from any source outside the
20 confines of this court.

21 Now, no member of the jury should attempt to
22 communicate with me or with any court personnel by any means
23 other than a signed writing, a signed note. All communication
24 has to be in writing, has to be signed by your foreperson --
25 who I'm going to appoint -- and given to one of the marshals

JURY CHARGE

1 who will be stationed outside of the jury room. I'll respond
2 to any questions or request you have as promptly as possible,
3 either in writing or more likely by bringing you back into the
4 courtroom, so that I can speak to you in person.

5 In any event, don't tell me or anyone else how the
6 jury stands on any issue until after a unanimous verdict is
7 reached. I not going to communicate with any member of the
8 jury on any subject touching on the merits of the case except
9 in writing or orally here, in open court.

10 Now, remember that you're going to have all the
11 exhibits admitted in evidence with you in the jury room. If
12 you find the need to view an official transcribed copy of the
13 portion of testimony, as I've told you, we'll get it for you,
14 but please remember that it's not easy to find the exact thing
15 you're looking for. So when you ask us for something, please
16 try to be as specific as you possibly can in identifying the
17 portions of testimony that you want to review, and tell us who
18 the witness was, what the particular topic was, as specific as
19 you can get. It will shorten our time as to finding that for
20 you.

21 When you've reached a unanimous verdict, please send
22 a note signed by your foreperson that you have reached a
23 verdict. Do not indicate in the note what the verdict is.

24 What I've done is, I've prepared a verdict form that
25 you will have with you in the jury room. The verdict form

JURY CHARGE

1 contains questions and the answers to those questions will
2 constitute your verdict.

3 So the way it's going to work is, you first send out
4 just a note signed by your foreperson that says, "We have
5 reached a unanimous verdict, signed foreperson." You hold
6 onto the verdict form. Once I have that note, I will call you
7 back into the courtroom. Ms. Clark will go over to the
8 foreperson and take the verdict form from the foreperson in
9 court, and then hand it to me, so that I can review it.

10 Now, I'm going appoint Ms. Mark as foreperson of the
11 jury. I'm afraid Ms. Mark, you don't get any more money for
12 doing that. It's not even really any more power. It's just
13 establishing you as a point of communication with the Court.

14 Remember, ladies and gentlemen, that the parties and
15 I are relying upon you to give full and conscientious
16 deliberation and consideration of the issues and evidence
17 before you. Your oath, the oath you took when you started
18 this process, sums up your duty and it is this: Without fear
19 or favor, you will truly try the issues between these parties
20 according to the evidence given to you in court and under the
21 laws of the United States.

22 Let me see the attorneys at sidebar for just a
23 moment.

24 (Continued on the next page.)
25

Sidebar

1 (Sidebar conference.)

2 THE COURT: Any reading errors in which you believe
3 in the charge?

4 MR. KING: No, Your Honor.

5 MR. BOWE: No.

6 MR. O'NEILL: Minor changes, but we don't consider

7 --

8 THE COURT: Are you objecting to anything?

9 MR. O'NEILL: Nothing, Your Honor. No.

10 THE COURT: All right. Thank you very much.

11 (Sidebar ends.)

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Sidebar

1 (In open court.)

2 THE COURT: Let's have the court officer come
3 forward.

4 (Court officer sworn.)

5 THE COURT: Ladies and gentlemen, you may retire
6 and begin your deliberations. We will have the instructions,
7 the verdict form and the exhibits brought into you shortly.

8 (Jury exits at 2:44 p.m.)

9 THE COURT: All right. Be seated, please.

10 I'm going to direct the parties to confer among
11 themselves and put together the exhibits that have been
12 admitted into evidence. Give those to Ms. Clark and she will
13 bring them into the jury room with a copy of the instructions
14 and the verdict form.

15 All right. Thank you all very much. Please
16 standby.

17 (Recess.)

18 THE CLERK: Counsel for trial, please come forward
19 and have a seat here.

20 All rise.

21 THE COURT: Be seated, please.

22 We have a note, which we have marked as Court
23 Exhibit Number 1, and it says, "What time did Mr. Woo enter
24 the -- Mr. Southerland apartment on the day the children was
25 removed?"

PROCEEDINGS

1 That's the note. My proposal is to answer the
2 question by saying, "That is a factual matter for you, the
3 jury, to determine. Anybody have a different view?

4 MR. O'NEILL: (Shakes head negatively).

5 MR. KING: (Shakes head negatively).

6 MR. BOWE: (Shakes head negatively).

7 THE COURT: Okay. Let's have the jury.

8 I'm also going to tell the jury that they can go as
9 late tonight as they want, and they should let me know when
10 they want to come back in the morning if they don't finish
11 tonight.

12 (Jury enters.)

13 THE COURT: All right. Be seated, please.

14 Ladies and gentlemen, we have your note, which I
15 will summarize as asking what time did Mr. Woo enter the
16 Southerland apartment on the day the children were removed.

17 The best answer I can give you to that is that is a
18 factual issue that you have to determine. As I told you, the
19 determination of facts is within your province, so you're
20 going to have to answer that question yourselves.

21 All right. We'll send you back to continue
22 deliberations. If there comes a point in time where you'd
23 like to be excused for the evening and come back tomorrow
24 morning, you'll confer and let us know that. Otherwise, I'll
25 let you keep going as long as you want to.

PROCEEDINGS

1 Thank you very much. I'll ask you to continue.

2 (Jury exits.)

3 THE COURT: All right. Be seated.

4 (Recess.)

5 (In open court, outside the presence of the jury.)

6 (Time noted: 6:05 p.m.)

7 THE CLERK: All rise.

8 THE COURT: All right. Be seated, please.

9 We have a note from the jury saying they'd like to
10 conclude for the evening and begin tomorrow at 9:30.

11 What I propose to do is tell them that's fine, but
12 then I don't want to formally convene here with all of you
13 tomorrow morning at 9:30. I'll tell them the usual admonition
14 and I'll tell them they should all meet back there, but they
15 cannot begin deliberating until they're all present. That
16 way, you need not come until ten to ten or even ten o'clock,
17 because they -- the first thing they do won't be to send us a
18 note or anything. Okay?

19 All right let's have them.

20 (Jury enters.)

21 THE COURT: All right. Be seated, please.

22 Ladies and gentlemen, we have your note asking to
23 adjourn for the evening, and that, of course, is fine.

24 I called you back in here for a couple of reasons.
25 First, I need to remind you on the usual restrictions on your

PROCEEDINGS

1 communications. I won't go over them in detail, but I will
2 tell you that especially at this stage of the case, no
3 communications with anybody about this case, please. No
4 research on the case, no internet postings, nothing at all, no
5 newspapers, no media. Don't talk to anyone about this case at
6 all. We need to keep you right where you are now.

7 The second thing I want to tell you is the way we
8 will reconvene tomorrow is this. We're not going to bring you
9 into court. You'll start at 9:30 on the assumption that
10 you're all there at 9:30. If for any reason one or more of
11 you is not there at 9:30, you can't start deliberating. Okay?
12 In other words, everyone must be in the room before you can
13 start talking about the case again. All right? So, you know,
14 if you have to wait a few minutes because someone is late,
15 that's just what you have to do. But once they're all there,
16 without bringing you back to court. You can then start
17 deliberating.

18 We all thank you very much for your hard work. We
19 hope you have a good evening. We'll see you tomorrow.

20 (Jury exits.)

21 THE COURT: All right. As I said, I think to be on
22 the safe side, let's have the lawyers back at say, 9:50
23 tomorrow, and we'll wait for the jury's next communication.
24 Have a good evening.

25 MR. KING: Thank you, Your Honor.

PROCEEDINGS

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MR. BOWE: You too, Your Honor.

(Trial adjourned to June 11th, 2013, at 9:30 a. m.)

PROCEEDINGS

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BOWE/SUMMATION	726
KING/SUMMATION	771
O'NEILL/SUMMATION	806
JURY CHARGE	841

\$	25 million [8] 803/21 803/21 803/21 803/21	728/11 730/15 731/9 738/2 748/6 759/10
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03 [1] 839/25	30th [6] 735/20 737/10 777/5 810/23 828/2	abuses [1] 837/3
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<p>E everybody... 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